



# PRIVACY POLICY

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## 1 Milner Boardman Partnership Limited

- 1.1 Milner Boardman Partnership Limited trading as Milner Boardman & Partners (“MBP”) is a limited company registered in England & Wales (Company Registered Number: 07195066). Contact details for MBP are as follows:-

Registered office & trading address: The Old Bank, 187a Ashley Road, Hale, Cheshire, WA15 9SQ.

Email: [office@milnerboardman.co.uk](mailto:office@milnerboardman.co.uk)

Telephone Number: 0161 927 7788

Website Address: <https://www.milnerboardman.com/>

- 1.2 MBP is fully committed to client confidentiality and protecting your personal data. We have appointed a member of this firm to act as our Information Officer and representative for data protection matters, her details are as follows:

Name: Natasha Baldwin

Address: The Old Bank, 187a Ashley Road, Hale, Cheshire, WA15 9SQ.

Email: [natashab@milnerboardman.co.uk](mailto:natashab@milnerboardman.co.uk)

Telephone Number: 0161 927 7788

## 2 The Policy

- 2.1 This privacy policy applies to MBP (“we”, “us” or “our”).
- 2.2 This policy is provided to comply with the requirements of UK GDPR (“GDPR”). Where the policy refers to “processing” or “process” personal data, this includes handling, collecting, protecting, and storing it. “Personal data” may also be referred to as “personal information”.
- 2.3 This policy explains how and why we collect and process your personal data, our legal basis for this and what we do to ensure that it is kept secure and private.
- 2.4 This policy also sets out your rights in respect of our collecting and processing of your personal data.
- 2.5 Under data protection law, a data controller is someone that makes decisions about how and why your personal data is used and has a duty to ensure that your rights are protected. MBP will be the data controller for the personal data described in this policy. A data processor means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.
- 2.6 It should be noted that where an Insolvency Practitioner of MBP is appointed as office holder and data processing is carried out as part of their statutory duties, the office holder may also be the data controller. An office holder (i.e. a Liquidator) also acts as an agent on behalf of the company but is subject to confidentiality in respect of any personal data collected and processed. MBP has two licenced Insolvency Practitioners, Darren Brookes and Natasha Baldwin, who are licenced to act as Insolvency Practitioners in the United Kingdom by the

Insolvency Practitioners Association. Darren Brookes is an appointment taking licence holder; however, Natasha Baldwin is currently a non-appointment taking licence holder. Further details of how our Insolvency Practitioners may collect and process your personal data can be found in our separate Privacy Policy (Office Holder).

### 3 Personal Data

3.1 Under the GDPR, personal data is defined as any information relating to an identified or identifiable natural person (data subject), of which some may be classed as special category data. It does not include data where the identity has been removed (anonymous data).

### 4 Special Category Personal Data

4.1 Special category data is personal data that needs more protection because it is sensitive.

4.2 Special category data, also known as “sensitive data”, may include:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Genetic information
- Biometric data
- Health
- Sex life or sexuality
- Criminal convictions or offences

4.2 MBP do not usually seek sensitive data, unless you provide us with such data or such data comes to light relating to an ongoing instruction, however in the event that we need to collect or process sensitive data about you, we will only do so where we have obtained your specific consent to collect and process this type of data or where we are permitted by law to process the data in order to comply with any legal or regulatory obligations or the processing is necessary to bring or defend legal actions or for legitimate interests.

4.3 Our Insolvency Practitioners, if appointed as office holders, may hold some special category data e.g. trade union membership or information about individuals’ health, which will be necessary to administer the insolvency process in line with their legal or regulatory obligations, further details can be found in our separate Privacy Policy (Office Holder).

4.4 We do not generally collect any information about criminal convictions and offences unless you provide us with such data or such data comes to light relating to an ongoing instruction.

4.5 As detailed at section 5.9 below, biometric data may also be obtained to confirm your identification in accordance with Money Laundering Regulations.

## 5 What Personal Data We Collect and How We Use Your Personal Data

- 5.1 We may collect, record and use your personal data in physical and/or electronic form and will collect and process that data as set out in this policy and in line with the Data Protection Legislation and in accordance with our internal data retention, protection and security policies in place from time to time.
- 5.2 We may receive personal information about you from you or from third parties when we are acting for you or a client company and we are required to obtain information about you, for example if you are employed by or an officer of a client company.
- 5.3 Where personal or financial information relating to another person or your partner is supplied by you, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it.
- 5.4 We may collect and process different kinds of personal data about you which we have grouped together follows:
- **Identity Data** includes full name, username or similar identifier, marital status, title, date of birth and proof of identity documents (information contained in a formal identification document or social security or other unique reference relating to you).
  - **Contact Data** includes correspondence addresses, billing addresses, email addresses and telephone numbers.
  - **Financial Data** includes bank account and payment card details \*\*
  - **Transaction Data** includes details about payments to and from you.
  - **Employment Information** may include job title, dates of employment, salary, National Insurance number, details of any sick leave, maternity/paternity leave and personnel files. We may receive this information from you, from your employer or from payroll and employment records provided.
- \*\* Where you make a payment to us by credit or debit card, we will use the payment card information only for the purpose of processing that specific transaction. No credit or debit card details are stored once your payment has been processed and the transaction completed.
- 5.5 During the course of MBP's engagement with a company prior to the formal appointment of an office holder, the Board and/or the shareholders of the company may disclose personal data to us in order that we may provide our services to the company. The company is also an independent controller responsible for complying with Data Protection Law in respect of the personal data it processes and, accordingly, where personal data is disclosed to us we will assume, and where appropriate seek confirmation, that disclosure is fair and lawful and otherwise does not contravene Data Protection Law.
- 5.6 If you wish to contact or be contacted by MBP, or for us to provide any contract or services, we will need to collect certain personal data from you (i.e. name, telephone number, address) so that we can assist with your queries or provide services. If you choose to supply personal data either through our website (contact form), by telephone, in person or via emails, or other correspondence that you may send to us, we will collect, process and share that personal data as detailed in this policy.

- 5.7 You do not have to submit any personal data to use our website, however should you choose to submit any personal data on our website, you agree to the use of such data in accordance with the terms set out in this privacy policy. If you complete and submit the contact form on our website, the site collects and stores the personal data that you have provided in the form. Such data may consist of your name, email address, telephone and any other financial or general information that you may choose to disclose.
- 5.8 If you engage us to provide you with services, the data that we collect may include the following:-
- Identity data
  - Contact data
  - Proof of identity documents (see money laundering provisions below).
  - Financial details
  - Other information relating to your business (including company books and records, company officers' details and employee details)
- 5.9 Money laundering provisions: In common with all accountancy and legal practices, we are required by the Proceeds of Crime Act and Money Laundering legislation to:
- (i) maintain identification procedures for all clients; and
  - (ii) maintain records of identification evidence.

Accordingly, before entering into a formal engagement, as part of our duties we are required to obtain certain information. As a minimum, we need sufficient information to enable us to properly identify the directors and the beneficial owners of the company, that is individuals who control, directly or indirectly, 25% or more of the voting rights of the company, together with any other person or company who exercises control over the management of the company.

This personal data is processed for a lawful purpose, to enable us to complete our anti-money laundering checks prior to accepting the formal appointment as office holder, for the purposes of preventing money laundering or terrorist financing. We will retain the data until we have no further lawful use for it, which is likely to be five years after the Office Holders (if appointed) leave office or receive their release.

In cases where legislation requires us to carry out an identification check, we may validate your name, address and other personal data supplied by you against an appropriate third-party database (we currently use Creditsafe). You should advise us if you do not consent to such a check being made. The checks are to confirm your identity only and a credit check is not performed so your credit rating will not be affected by our identity check.

#### *Biometric Identity Verification*

We may also use Credas Technologies Ltd, a government certified provider, to complete our identification checks. They use biometric identity verification & AML technology.

If you use Credas to verify your identity at our request, this may include using biometric (facial) data which is categorised as special category data.

Under data protection laws we can only process special category data for specific purposes or if we have your explicit consent.

Your consent will be obtained as part of the Credas registration process. If you do not provide your consent this data to be processed, we will not be able to carry out these verification checks.

The biometric data will be used to determine the likeness between your selfie image and your photo identity document. This determination will be completed by Credas who will retain the biometric data for 30 days before it is automatically erased. We/Credas will retain the selfie (but not the biometric mapping) until we have no further lawful use for it, which is likely to be five years after you cease being a client for statutory purposes. The Credas Terms & Conditions (which you would be asked to accept during registration) and Privacy Policy can be found on their website.

Please note that your provision of documents for identity verification purposes is necessary for us to comply with our legal and statutory obligations. Failure to provide these documents may result in us not being able to undertake identity verification as required by the Money Laundering regulations and subsequently we may not be able to act for you or the company instructing us.

- 5.10 If you choose not to provide certain personal information to MBP, it may prevent the execution of the contract and we may not be able to provide you with some of the services.
- 5.11 Where we receive personal information about you, we will only use that personal information to provide services to you or to comply with our legal or regulatory duties and obligations (i.e. to undertake due diligence and money laundering checks).
- 5.12 Personal data may also be provided through referrals including professional advisors (e.g. accountants) who may refer you or your company to us.
- 5.13 If we collect personal data about you from a source other than you, where appropriate we will inform you of where that data came from and what the data is.
- 5.14 Personal data may also be obtained from public sources or bodies such as the Registrar of Companies (i.e we may look at information held by the Registrar of Companies to establish who the directors and beneficial owners of a company we are acting for are), Electoral Register, HM Land Registry and other similar public-access data providers and HM Revenue & Customs ("HMRC").
- 5.15 Where personal data relating to another person is supplied to us, we will either confirm that consent has been provided or that we are otherwise entitled to use this data, as appropriate. Where personal or financial information relating to another person or your partner is supplied by you, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it.
- 5.16 Job Applicants & Emergency Contacts: If you have made a job application we will collect and hold your personal data, including information that you provide to us in your application, or provided to us by recruitment agencies, as well as personal data from any referees you provide. This is necessary to enter an employment contract with you and for our legitimate interests in evaluating candidates and as necessary to comply with employment law

obligations and rights. You must provide certain information (including name, contact details and professional & educational history) for us to consider your application fully. If you are successful in your application, your information will be used and stored in accordance with our internal policies. If you are listed as an emergency contact for someone who works for us, we will hold your name, contact details and details of your relationship with that employee. We will use this to contact you as necessary to carry our obligations under employment law, to protect vital interests of that employee, and for our legitimate interests in administering our relationship with that employee. Your information will be kept until it is updated by the employee, or until the employee has stopped working for us.

- 5.17 If you are one of our business contacts (which may include tax advisers, accountants, solicitors, employment agents, pension specialists, insurers, valuers or debt collection agents) and we are working with you to provide services to a client we will collect information about you (including name, contact details and job title) to provide such services. This is necessary for our legitimate interests.
- 5.18 If you are a creditor of a company/debtor that we are acting for, by requesting details of your claim in a proposed insolvency process, we may collect personal data from you, particularly if you are a consumer creditor, sole trader or you are lodging a claim in your personal capacity. The personal data that we collect may include, but is not limited to:
- Your name
  - Your contact details (address, telephone number, emails address)
  - Details of your claim

Further details can be found in our separate Privacy Policy (Office Holder)

- 5.19 All information you supply us is required to enable us to comply with our duties under the Insolvency Act 1986, The Insolvency (England & Wales) Rules 2016 and associated legislation.
- 5.20 If you do not provide us with certain information when requested, such as your contact data or details of the amount of your claim, it may impact our ability deal with your claim or your right to participate in any decision procedure in the insolvency process. Your personal data will be used to enable us to assess the extent of the insolvent entity's liabilities, to allow you to vote on any decision procedures and to enable us to communicate with you.
- 5.21 We are unable to guarantee the security of external networks including the internet or your own device, accordingly any online communications (e.g. information provided by email or via the website) are at your own risk.
- 5.22 We will only use any personal data supplied to us when we are lawfully permitted to do so. The law states we must identify the purpose and basis upon which we use your personal data. Under the GDPR, processing shall be lawful only if and to the extent that at least one of the following applies:
- You have given clear and specific consent to the processing of your personal data for one or more specific purposes.
  - Where processing is necessary for the performance of a contract which we have entered into with you or in order to take steps at your request prior to entering into a contract.



- Where processing is necessary for compliance with a legal obligation (not including contractual obligations).
- Where processing is necessary in order to protect your vital interests or the vital interest of another natural person.
- Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- Where processing is necessary for the purposes of our legitimate interests or the legitimate interests of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

5.23 We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

5.24 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our Information Officer if you need details about the specific legal ground/s we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of Data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To make suggestions and recommendations to you about appropriate formal or informal insolvency options	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To register you as a new client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To complete identity checks	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To carry out our conflict/ethical checks to ensure that we are able to provide services to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To enter into and perform the contract we have with you or your company (where you are an employee or an owner of that business)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests</li> </ul>
To deliver our service to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover amounts due to us)</li> </ul>
To manage our relationship with you which will include: (a)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>

Notifying you about changes to our terms or privacy policy		<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated)</li> </ul>
To assist in the management of queries, complaints, or claims	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
To send you relevant notices of a proposed insolvency process	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> </ul>
To assist with employment claims in an insolvency process and to communicate with employees and send notices of a proposed insolvency process	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Employment</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> </ul>
To maintain a register of corporate gifts and hospitality to comply with anti-bribery laws	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> </ul>

## 6 Consent

- 6.1 Other than where specified in this policy, MBP do not generally request your consent to use your personal data as it is generally collected and processed for one of the other lawful bases as set above. However, if we have asked for your specific permission or consent to have and to use your personal data, you have the right to withdraw that consent at any time by contacting our Information Officer.
- 6.2 This will not affect any processing of your personal data which we have done before you withdrew your consent.
- 6.3 Please note that in certain circumstances it may still be lawful for us to continue processing your personal data even where you have withdrawn your consent, if one or more of the other legal bases detailed above, are applicable.

## 7 Sharing your personal data

- 7.1 Our work for you may require us to provide data to third parties who will use your data for the purposes of providing services to us or directly to you on our behalf. We will only share your personal data with third parties in the following circumstances:
- Where we have your permission.
  - Where we are required to do so in order to provide the services to you (for example we may need to share your personal data with the Insolvency Service, the Redundancy Payments Service, Companies House, tax advisors, employment agents, pension specialists, insurers solicitors or agents/valuers).
  - To our licencing body and to our professional advisers for the purposes of obtaining professional advice or establishing, exercising, or defending legal rights or as reasonably required in the management of our business.

- To our suppliers or third parties involved in the performance of services. We may also share data to third party organisations who assist us in providing services to clients or are otherwise involved in the services we provide to clients.
- Third parties who provide IT services, data processing or functionality. We use third party providers to support our business and the provision of services to our clients such as cloud based service and software providers, web hosting/management providers, document management systems, printing, storage providers and IT support. Your personal information stored on our systems may be seen by our IT service provider, and other providers of technical services, if they need access to those systems to fix a technical problem or support our business.
- Where appropriate, personal data may be disclosed to law enforcement, regulatory or other government bodies, tax authorities, HMRC, accountants, or third parties where necessary to comply with legal or regulatory obligations or for the purposes identified above. For example, we may share your data with the National Crime Agency or Serious Fraud Office.

7.2 We will not share any personal data for marketing purposes without your explicit consent and we do not undertake mailings for third parties.

7.3 If in the unlikely event, we need to share your personal data outside of the UK, we will discuss this with you beforehand.

7.4 We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7.5 Third parties to whom we disclose information about you will be under an obligation to keep your information secure and not to use it for any purpose other than that for which it was disclosed unless you agree with them otherwise. When they no longer need your data to fulfil this service, they should dispose of the details in line with the GDPR principles.

## **8 How long do we keep your personal data?**

8.1 We will only retain your personal data for as long as necessary to fulfil the purpose for which we collected it and in line with any retention period that is required by law, accounting, reporting or specific business-sector requirements and agreed practices and in accordance with our internal data retention, protection and security policy.

8.2 In respect of personal data required by law when commencing a client engagement (including Contact, Financial and Transaction Data), the period for retaining your personal data is usually 6 years from the date on which the relevant matter has been closed or has ended.

8.3 Money Laundering ID and associated records: copies of identification records obtained (or the references to such evidence) and also the supporting records (originals or copies) are to be kept for a period of five years from the date on which the business relationship ends, i.e. the date of release of the officeholder. They are to be stored securely and destroyed when appropriate, in accordance with our privacy policy, data retention policies and relevant procedures.

8.4 We regularly review what data we have and delete that which is no longer necessary.

8.5 Further details of personal data processed by Office Holders can be found in our Privacy Policy (Office Holders).

## 9 What are your rights?

9.1 You are classed as a “data subject” and you have the following legal rights: -

Right of..	You have the right to..
Access	ask for a copy of the personal data we hold about you
Rectification	ask that we correct any personal data that we hold about you that is inaccurate or incomplete. We have an obligation to ensure that the information we hold about you is complete and accurate.
Forgotten (to be)	ask us to erase or remove personal data from our records, in certain circumstances, where there is no reason for us to continue to hold it
Processing	ask us to restrict the processing of your personal data in certain circumstances. You also have the right to object to the processing of your personal data in certain circumstances.
Portability	request that your personal data is transported to another organisation
Object	Object to certain types of processing and important decisions being made about you
Withdrawal	withdraw your consent for specific processing of your personal data, as detailed at section 5.

- 9.2 Please contact our Information Officer if you wish to find out what personal data we hold about you, if you believe that any of the personal data we hold is incomplete or inaccurate, if you would like us to delete your personal data or if you have any further queries about how we process your personal data.
- 9.3 If you would like to access or see a copy of your personal data, you must ask in writing.
- 9.4 We will treat any requests to access, change and/or delete personal data in accordance with applicable legal requirements. We will always try and deal with any request to your satisfaction, however there may be situations where we are unable to do so (for instance if we are required by law to keep your personal data).
- 9.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.
- 9.6 We will endeavour to respond to any request within a reasonable period, and in any event in line with any timescales required by the Data Protection Legislation.
- 9.7 We may also send any requests received to anyone else we have shared your personal data with. For more information, please see Section 6.
- 9.8 You are not required to pay any charge for exercising your rights, however a charge may be levied to cover the administration costs of any unfounded or excessive requests, if appropriate.
- 9.9 Automated Decision Making: Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved. MBP does not make automated decisions using personal data.

## 10 Website/ Cookies/Google Analytics

- 10.1 Our website may include links to third party websites which are not governed by this privacy policy. We do not control these third-party websites and are not responsible for their privacy statements. You are encouraged to read the privacy statement for any website you visit.
- 10.2 A cookie is a small data file which asks permission to be placed on your device. If you agree, the file is added, and the cookie helps analyse web traffic. You can accept or decline cookies by changing the settings in your web browser. To find out more about cookies visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Our website does not currently use any cookies.
- 10.3 Our website does have a google tracking code for analytics and we use the Google Analytics service from Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google") to analyse our website visitors. Google uses cookies. Users can prevent the collection of data generated by cookies by downloading and installing the browser plug-in that is available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Further details of how Google collects and processes data when you use our website can be found at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

## 11 Data Security

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

## 12 Further Information/How to complain

- 12.1 We have various measures in place (including physical, electronic and managerial procedures) to keep your personal data safe and to prevent unauthorised access to or use or disclosure of it. Electronic data is stored on secure computer systems, and we control who has access to it. Our staff receive regular data protection training, and we have data protection policies in place which all staff are required to follow when handling your personal data.
- 12.2 We are registered with the Information Commissioners Office ("ICO") registration number Z3288447.
- 12.3 If you have any concerns about our use of your personal data then please contact our Information Officer or Office Holder in the first instance.
- 12.4 If you are still not satisfied that we have addressed your concerns adequately you have a right to lodge a complaint with the ICO, which oversees data protection in the UK, the details of which are available at [www.ico.org.uk](http://www.ico.org.uk).

- 12.5 This version of our privacy policy is effective from 2 July 2024. Our privacy policy is reviewed at appropriate intervals, and we reserve the right to modify or amend this privacy policy at any time. We encourage you to review this statement periodically to remain informed about how we are protecting your personal data.
- 12.6 Where applicable, this privacy policy should be read in conjunction with our Privacy Policy (Office Holders) which is also available on our website or a copy can be requested from our Information Officer.