



PRIVACY POLICY

We take your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on how and why we collect, store, use, and share your personal data. It also explains your rights in relation to your personal data and what to do if you have a complaint.

This privacy policy does not apply to any third party websites that may have links to our own website.

1. WHO ARE WE AND WHAT DO WE DO?

- 1.1. Ledgify Accounting Limited provides comprehensive accountancy services to sole traders, partnerships, and limited companies. Services include bookkeeping, VAT returns, payroll, financial accounts preparation, and the preparation and submission of personal, business, and corporation tax returns.
- 1.2. We collect, use, and are responsible for certain personal data about you. When we do so we must comply with the UK General Data Protection Regulation (UK GDPR), and all applicable Data Protection regulations.
- 1.3. Our services and website are not aimed specifically at children. If you are a child and you want further information about how we might use your data, please contact us (see '**How to contact us**' at section 15 below).

2. TERMINOLOGY

The following key terms used throughout this policy are defined below:

We, us, our shall mean Ledgify Accounting Limited;

Personal data shall mean any information relating to identified or an identifiable individual;

Special category shall mean any:

- personal data**
- (i) personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership;
 - (ii) genetic data;
 - (iii) biometric data (where used for identification purposes); and
 - (iv) data concerning health, sex life or sexual orientation;



Data subject shall mean the individual who the personal data relates to; and

You, your shall mean, as the context dictates, As the context dictates, our clients and individuals associated with them, contacts, suppliers, and any individuals whose personal data we receive in the course of providing our services.

3. PERSONAL DATA WE COLLECT

3.1. The personal data we collect about our clients depends on the particular services we provide and their relationship with us. We will only collect data that is necessary, relevant, and appropriate in order to provide services including, but not limited to:

- 3.1.1. full name, job title, and contact details (including email address and telephone number);
- 3.1.2. business name and address, and where relevant, home address;
- 3.1.3. identification and verification data (e.g. date of birth, National Insurance number, passport or driving licence, utility bills) for AML compliance;
- 3.1.4. financial details required to carry out our services, including bank account or payment details, transaction history, and tax reference numbers;
- 3.1.5. information related to your occupation, employment status, and business activities;
- 3.1.6. communication records including emails, notes, and documents shared in the course of service delivery;
- 3.1.7. marketing and communication preferences, where applicable;
- 3.1.8. any other personal or financial information required to fulfil our contractual and legal obligations to you; and
- 3.1.9. Any other information collected from Cookies on our website.

3.2. The main purpose of collecting and using this information is to provide products and services to our clients. However, we may also collect and use the above information for the purposes set out in section 5.3

3.3. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

4. HOW YOUR PERSONAL DATA IS COLLECTED

4.1. We collect most of the above information from you, however, we may also collect information:

- 4.1.1. from publicly accessible sources (i.e Companies House);
- 4.1.2. directly from credit agencies (i.e credit agencies);

- 4.1.3. from a third party with your consent (i.e a bank or another financial institution; and
- 4.1.4. via our website; we use cookies and similar technologies on our website (for more information on cookies, please see our legal notice page on our website).

5. HOW AND WHY WE USE PERSONAL DATA

- 5.1. Under data protection law, we can only use your personal data if we have a proper reason, such as:
 - 5.1.1. when you have given consent (where your consent is required, we will ask for it separately of this Privacy Policy and you can withdraw consent at any time);
 - 5.1.2. to comply with our legal and regulatory obligations;
 - 5.1.3. to fulfil our contract with you or take steps at your request before entering into a contract; or
 - 5.1.4. for our legitimate interests or those of a third party.
- 5.2. A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights, and freedoms or the processing is required to establish, exercise, or defend legal claims.
- 5.3. The table below explains what we use your personal data for and the correlating purpose:

Use of Personal Data	Purpose and Legal Basis
Provision of professional services to clients	To fulfil our contractual obligations or to take steps at your request prior to entering into a contract.
Fraud prevention and detection	For our and your legitimate interests, namely, to detect, prevent and minimise fraud or financial crime.
Conflict of interest checks	To comply with our legal and regulatory obligations under relevant professional and ethical standards.
Client identification and verification (e.g. AML checks)	To comply with our legal and regulatory obligations under the Money Laundering Regulations.
Screening for sanctions or embargoes	To comply with our legal and regulatory obligations.

Compliance with legal and regulatory obligations (e.g. tax, health & safety)	To comply with our legal obligations, or where appropriate, for our legitimate interests in operating a compliant business.
Defending or pursuing legal claims	To comply with legal obligations or for our legitimate interests (or those of a third party) in establishing, defending, or pursuing claims.
Responding to audits, regulatory enquiries or investigations	To comply with our legal obligations or for our legitimate interests in engaging effectively with regulators.
Enforcing internal policies and procedures	For our legitimate interests, namely, to ensure good governance, risk management and consistent service delivery.
Improving efficiency, training, and quality control	For our legitimate interests, namely, to deliver the best service at the best value through continuous improvement.
Protecting confidential or commercially sensitive information	For our legitimate interests, namely, to protect valuable business information and comply with confidentiality obligations.
Business and financial analysis (e.g. service performance or planning)	For our legitimate interests, namely, to manage and grow our business responsibly and effectively.
System and data security	To comply with legal obligations or for our legitimate interests in protecting client data and business systems from unauthorised access or misuse.
Maintaining accurate and up-to-date client records	To fulfil our contractual obligations, comply with legal duties, or for our legitimate interests in effective communication.
Filing statutory returns (e.g. HMRC, Companies House)	To comply with our legal and regulatory obligations.

Ensuring safe working practices and employee administration	To comply with legal obligations and for our legitimate interests in operating safely and efficiently.
Service updates and marketing communications	For our legitimate interests in promoting our services, or with your consent (which can be withdrawn at any time).
Handling complaints, feedback or insurance matters	To comply with legal obligations or for our and your legitimate interests in resolving issues and managing risk.
External quality checks or accreditations (e.g. AAT, ISO)	To comply with legal obligations or for our legitimate interests in maintaining professional and industry standards.
Business restructuring, sale, or succession planning	To comply with legal obligations or for our legitimate interests in protecting or realising business value. Data will be anonymised where possible.

- 5.4. where we process special category personal data (see section 2 ‘Terminology’), we will also ensure we are permitted to do so under data protection laws, for example:
- 5.4.1. we have your explicit consent;
 - 5.4.2. the processing is necessary to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent;
 - 5.4.3. the processing is necessary to establish, exercise or defend legal claims; or
 - 5.4.4. the processing is necessary for reasons of substantial public interest.

6. MARKETING

- 6.1. We may use your personal data to send you updates (eg by email, text message, telephone, post or social media channels) about our services, including exclusive offers, promotions or new services.
- 6.2. We have a legitimate interest in using your personal data for marketing purposes (see section 5). This means we do not usually need your consent to send you marketing information, however, where this is not the case, we will always ask for your consent.

- 6.3. In all cases, you have the right to opt out of receiving marketing communications at any time by contacting us at accounts@ledgify.co.uk.
- 6.4. We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.
- 6.5. We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.
7. WHO WE SHARE YOUR PERSONAL DATA WITH
- 7.1. We routinely share personal data with:
- 7.1.1. third parties we use to support the delivery of our services, such as providers of our finance systems, IT services, cloud storage platforms, and accounting software;
 - 7.1.2. service providers who support compliance activities, including anti-money laundering checks and identity verification (e.g. financial institutions or credit reference agencies);
 - 7.1.3. other third parties who support our business operations, such as email marketing or communication platforms (used with your consent where required);
 - 7.1.4. our banking provider, in relation to invoicing, payment processing, and financial transactions; and
 - 7.1.5. third parties approved by you, such as payment processors or external advisors you instruct us to liaise with on your behalf.
- 7.2. We only allow these organisations to handle your personal data where we are satisfied they apply appropriate data protection and security measures. Where relevant, we ensure third parties are bound by data processing agreements that reflect our legal obligations.
- 7.3. We and the third parties listed above may occasionally share personal data with:
- 7.3.1. our external accountants, auditors or regulatory reviewers, where required, and always subject to confidentiality obligations;
 - 7.3.2. our professional advisors, such as legal or compliance consultants, who are also bound by confidentiality obligations;
 - 7.3.3. law enforcement authorities, courts, tribunals, or regulators, where disclosure is required by law or regulation; and
 - 7.3.4. any parties involved in a potential business restructuring or succession (e.g. sale or transfer of the business), in which case, where feasible, data will be anonymised and confidentiality safeguards will be in place.
- 7.4. If you would like more information about who we share our data with and why, please contact us (see ‘**How to contact us**’ at section **Error! Reference source not found.**).



8. WHERE YOUR PERSONAL DATA IS HELD

- 8.1. Personal data may be held at our premises and those of our third party agencies, service providers, representatives, and agents as described in section 7.
- 8.2. Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see section 10.

HOW LONG YOUR PERSONAL DATA WILL BE KEPT

- 8.3. We do not keep personal data for longer than necessary. Data is retained only for as long as required to fulfil the purposes for which it was collected, including to meet legal, regulatory, and professional obligations.
- 8.4. If we are no longer providing services to you, we will usually retain your data for up to seven years, in order to comply with our legal and tax obligations (for example, HMRC record-keeping requirements), and for potential queries or disputes.
- 8.5. After the relevant retention period ends, your personal data will either be securely deleted or anonymised so that it can no longer be linked to you.

9. TRANSFERRING YOUR PERSONAL DATA ABROAD

- 9.1. As a UK-based accounting practice, we primarily use systems and service providers that store personal data within the UK. However, some of the platforms we use to support our business operations may store or process personal data in countries outside the UK.
- 9.2. Where personal data is transferred outside the UK, we ensure that one of the following conditions applies:
- 9.2.1. the UK government has recognised the country as providing an adequate level of data protection (an “adequacy decision”);
 - 9.2.2. appropriate safeguards are in place, such as standard contractual clauses approved for international transfers, along with enforceable data subject rights and effective legal remedies; or
 - 9.2.3. a specific exemption under UK data protection law applies (e.g. the transfer is necessary to perform a contract).
- 9.3. If you would like further details about how your data is protected when transferred outside the UK, or to request a copy of the relevant safeguards, please contact us using the details in section 16 (‘How to contact us’).
- 9.4. **Service Providers and International Data Transfers:**

Service Provider	Purpose	Country of Data Processing	Transfer Safeguard
Xero	Cloud-based accounting software	UK & New Zealand	UK adequacy regulations (New Zealand is

			recognised as adequate by the UK)
TaxCalc	Accounting and tax software (on-prem/cloud)	UK (local installation or UK-based servers)	UK-based storage — no international data transfer (at present)
Dropbox	File storage and backup (if used)	United States	Standard Contractual Clauses + UK International Data Transfer Agreement (IDTA)
Fastmail	Email hosting	Australia (with global infrastructure)	Standard Contractual Clauses + IDTA

10. YOUR RIGHTS

10.1. You have the following rights, which you can exercise free of charge:

Access	You have the right to ask us for copies of your personal data. You can request other information such as where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for.
Rectification	You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete.
Erasure (also known as the right to be forgotten)	You have the right to ask us to delete your personal data, in certain situations.
Restriction of processing	You have the right to ask us to limit how we use your personal data, in certain situations, eg if you contest the accuracy of the data.
Data portability	You have the right to ask that we transfer the personal data you gave us to another organisation or to you, in certain situations.
To object	You have the right to object: <ul style="list-style-type: none"> (i) at any time to your personal data being processed for direct marketing (including profiling); or (ii) in certain other situations to our continued processing of your personal data, eg processing carried out for our legitimate interests unless we demonstrate compelling legitimate grounds for the

	processing which override your interests or for establishing, exercising or defending legal claims.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
The right to withdraw consent	When we use your consent as our lawful basis, you have the right to withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

10.2. If you make a request, we must respond to you without undue delay and in any event within one month.

10.3. If you would like to exercise any of your rights, please:

10.3.1. email, call, or write to us using the contact details provided in section 16;

10.3.2. provide enough information to identify yourself (e.g. your full name, business name, and client reference number, if applicable), along with any additional ID information we may reasonably request; and

10.3.3. let us know clearly which right you want to exercise and the specific information your request relates to.

11. KEEPING YOUR PERSONAL DATA SECURE

11.1. We have implemented appropriate technical and organisational measures to help keep your personal data secure and confidential. This includes protecting it from unauthorised access, use, or disclosure. Access to personal data is limited to those within our business who have a genuine need to access it.

Anyone handling your data is required to do so only in an authorised manner and is subject to confidentiality obligations.

11.2. We require any third parties, such as our service providers or software partners, to apply appropriate security standards to protect personal data and prevent unauthorised access, use, or sharing.

11.3. We also have procedures in place to deal with any suspected data breaches. Where legally required, we will notify you and the relevant data protection authority if a breach occurs that affects your personal data.

12. HOW TO COMPLAIN

12.1. Please contact us if you have any queries or concerns about our use of your personal data (see below ‘How to contact us’). We hope we will be able to resolve any issues you may have.

12.2. You may also have the right to lodge a complaint with the Information Commissioner’s Office (the UK data protection regulator, also known as the ICO).

12.3. The contact details for the ICO are:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

13. CHANGES TO THIS PRIVACY POLICY

13.1. This privacy policy was published on 2nd January 2026 and last updated on 2nd January 2026.

13.2. We may change this privacy policy from time to time. When we do, we will publish the updated version on our website and ask for your consent to changes, where legally required

14. UPDATING YOUR PERSONAL DATA

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed. Please see below 'How to Contact Us'.

15. HOW TO CONTACT US

If you have any questions about this privacy policy, the personal data we hold about you, or if you would like to exercise any of your rights under data protection law, you can contact us by post, email, or telephone using the details below:

Our contact details:

Ledgify Accounting Limited

Stoke Abbott Court, Stoke Abbott Road, Worthing, BN1 1HJ

accounts@ledgify.co.uk

+44 1273 761009