

## **CPAA - Privacy Notice Members and Applicants for Membership**

### **What is this document and who is it for?**

This document is intended to provide you with important information about how we process your personal data. This includes details of what personal data we hold, how we store it, what we do with it, why we hold it and how long we hold it for.

The contents of this document apply only to members of the Association and applicants. Please check the Association's website ([www.acpa.org.uk](http://www.acpa.org.uk)) or contact the Association for a copy of a relevant privacy notice if you are not a member. Please note that if you are a member and also have another relationship with the Association (for example, if you are also a student) then this privacy notice will apply to you, though other privacy notices may also apply.

The below 'summary information' section provides some general summary information about what we do with your personal data. Full details can be found in the table at the end of this notice.

### **Summary information**

In order to provide you with the benefits of membership and independent regulation the Association must process your personal data. We use this information to; monitor who is and has been a member; send communications to you (including news and update bulletins, our digital magazine, reminders about completing annual return forms and information about upcoming seminars held by the Association); ensure you are compliant with CPAA rules and certain applicable legislation; and, to arrange provision of other benefits of membership (such as enrolment on the group insurance scheme, if you have opted to be involved in this).

We hold your personal data on our cloud-based databases, our outlook emails systems, as spreadsheets stored locally on our computers and, in some instances, as physical printouts stored in locked filing cabinets.

Becoming a member of the Association is voluntary and is not required to practice as an accountant. You provide us with your personal data so that we can offer you the various benefits of membership and to offer you independent regulation.

### **Data Protection Policy**

You should read this privacy notice in connection with the Association's data protection notice. The data protection policy can be accessed from our website or on request.

### **Data controller's and data protection officer's details**

**Data Controller:** Certified Public Accountants Association (Incorporated in England under company number: 03448159)

**Data Protection Officer:** Lee Haywood

## **How to contact us with any questions**

If you would like to contact us, please use the below methods. Please note that our office closes on weekends and English bank holidays. We normally close the office over the Christmas period, including some normal working days, please contact us for more information. If your contact relates to exercising your rights under data protection legislation it will help us if you make your communication in writing (either post or email).

**Email:** [admin@acpa.org.uk](mailto:admin@acpa.org.uk)

**Telephone:** 01204 693 988

**Post:** CPAA, Unit F, Lostock Office Park, Lynstock Way, Lostock, Bolton, Greater Manchester, BL6 4SG

## **Your rights**

Under data protection legislation you have eight main rights relating to your personal data:

1. Right to be informed
2. Right of access
3. Right to rectification
4. Right to erasure
5. Right to restrict processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision making including profiling

For more information on your rights and how we uphold your rights, please visit the Information Commissioner's Office's website ([www.ico.org.uk](http://www.ico.org.uk)) and review our data protection policy, which can be accessed from the relevant sections of our website or can be provided on request.

If at any time you would like to exercise one of your rights under data protection legislation, please contact us. We recommend that you consult our data protection policy before contacting us.

If you would like to make a complaint about the Association's handling of personal data and how we have met our obligations under data protection legislation you can contact the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)). Though we would always encourage you to contact us in the first instance so that we can attempt to resolve your complaint.

## **Personal data we process for members**

Personal Data	Why is the Data Processed? (Lawful Basis)	Where is the Data is Stored?	Who has Access to the Data?	How long is the Data Kept?	Who else is the data transferred to?	Is the data transferred to a third country? (Name of Country)	Details of safeguards in place (if transferred to a third country)
<b>Note</b>							
<p>Personal data highlighted in green only applies to practising members, or those applying for practising membership.</p> <p>Information is only transmitted to Buckland Harvester if the member or applicant, wishes to join, or participates in, the Association's group insurance scheme. This information will be passed to the provider of the Association's group insurance scheme, which changes from time to time.</p> <p>Information on international members will not be transferred to Simply Voting or AMLCC.</p> <p>Buckland Harvester is 'Buckland Harvester Insurance Brokers (Registered in England and Wales: 05402834) and is the Association's insurance broker responsible for administering the Association's group insurance scheme.</p> <p>AMLCC is the 'Anti-Money Laundering Compliance Company' (Registered in England and Wales: 04525430) and is a provider of online tools which can be used to aid an accountancy practice in anti-money laundering compliance, practicing members of the Association are entitled to receive one-year free use of the product.</p> <p>Wild Apricot is 'Wild Apricot Inc. 144 Front Street West, Suite 725, Toronto, Ontario M5J 2L7, Canada' and is a provider of web-based tools for membership organisations, including data base tools.</p> <p>Simply Voting is 'Simply Voting Inc. 5253 Decarie Boulevard, Suite 250, Montreal, QC, H3W 3C3, Canada' and is a provider of secure voting/election online software, which the Association uses to conduct critical votes, including voting for its AGM.</p> <p>MailChimp is owned by 'Rocket Science Group, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA (registered in Georgia, United States of America, with control number 17133268) and is a system used to send and track emails, which the Association uses to send some communications to members.</p> <p>BACS is a wholly owned subsidiary of 'NPSO Limited' (Registered in England and Wales: 10872449) and is used by the Association to process direct debits.</p> <p>Secure Trading (Registered in England and Wales: 04591066) is used by the Association to process card payments.</p>							
Full name including title	<ul style="list-style-type: none"> <li>To assist in identifying the member</li> <li>To enable communications to be sent regarding the individual's membership, for example, renewal information</li> <li>This data is processed under legitimate interest and to enable the execution of contact</li> </ul>	<p>This information is primarily stored on the Association's two database systems the; www.acpa.org.uk website and Wild Apricot. Data stored on the Association's website is held on Microsoft Azure Servers (<a href="https://azure.microsoft.com/en-gb/">https://azure.microsoft.com/en-gb/</a>) and data stored on Wild Apricot is held on their servers (<a href="https://www.wildapricot.com/">https://www.wildapricot.com/</a>).</p> <p>From time to time data might be transmitted by email, especially were it concerns applicants or ongoing issues.</p>	All Association administration employees have access to this data. The data may, from time to time, in relevant circumstances, be transmitted to other members involved in the performance of the Association's disciplinary or management functions.	Indefinitely, as this allows the Association to identify past members, which it needs to do in the public interest.	<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>Simply Voting</li> <li>Published on public membership directory</li> <li>MailChimp</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> <li>Members of the public, regulators and law enforcement on request</li> </ul>	Canada USA	Contractual clauses in the terms of use. Technical and contractual protections to ensure Wild Apricot and Simply Voting cannot access specific details on a member. MailChimp has certified compliance with the EU-US Privacy Shield Framework
Name of your practice		<p>This data is stored locally on password protected computers and on Microsoft servers, which are password protected. From time to time data may also be stored in a physical format, this is always locked in a secure environment or destroyed after use.</p>			<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>AMLCC</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> <li>Provided to members of the public, regulators and law enforcement on request</li> </ul>	Canada	
Company number					<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> <li>Provided to regulators and law enforcement on request</li> </ul>		
Office address							
Home address							
Phone number(s)							
E-mail address					<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>Simply Voting</li> <li>MailChimp</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>	Canada USA	

					<ul style="list-style-type: none"> <li>• Provided to regulators and law enforcement on request</li> </ul>		
Date joined/left	<ul style="list-style-type: none"> <li>• To identify when a member's renewal is</li> <li>• To assist in identifying the member</li> <li>• This data is processed under legitimate interest and to enable the execution of contact</li> </ul>				<ul style="list-style-type: none"> <li>• Buckland Harvester</li> </ul>	Canada	
Date of birth	<ul style="list-style-type: none"> <li>• To assist in identifying the member</li> <li>• To generate statistics and monitor age profile of the Association's membership</li> <li>• This data is processed under legitimate interest and to enable the execution of contract</li> </ul>				<ul style="list-style-type: none"> <li>• Provided to regulators and law enforcement on request</li> <li>• From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>	Canada	
Annual turnover	<ul style="list-style-type: none"> <li>• To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership</li> <li>• To risk assess the member in accordance with the Association's Rules and Bye-Laws</li> <li>• This data is processed under legitimate interest and to enable the execution of contract</li> </ul>			<p>Throughout the duration of membership and for twenty working days after resignation or termination of membership, unless there are compelling reasons not to delete. This enables appropriate risk assessments to be made and allows the member to make an application to re-join within the twenty working days window detailed in the Association's Rules and Bye-Laws. For applicants who fail to transition to members this information is retained for a period of one year.</p>	<ul style="list-style-type: none"> <li>• Provided to members of the public, regulators and law enforcement on request</li> <li>• From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
Largest fee charged							
Total number of clients							
Number of clients in cash-based businesses							
Countries any international clients are based in							
If the practice uses subcontractors							
Details of any co-directors, partners and shareholders within the practice							
Details of MLR supervisor							
Membership of any other professional body (and if a practicing certificate is held)				<p>Indefinitely, as this allows the Association to maintain and identify past members, which it needs to do in the public interest. For applicants who fail to transition to members this information is retained for a period of one year.</p>	<ul style="list-style-type: none"> <li>• Provided to regulators and law enforcement on request</li> <li>• From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
History of Practicing Certificates issued by the CPAA	<ul style="list-style-type: none"> <li>• To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership</li> <li>• To inform third parties, if and when the member has held the Association's Practicing Certificate</li> <li>• To risk assess the member in accordance with the Association's Rules and Bye-Laws</li> </ul>				<ul style="list-style-type: none"> <li>• Provided to regulators and law enforcement on request</li> <li>• From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		

	<ul style="list-style-type: none"> <li>This data is processed under legitimate interest (as it is a reasonable expectation that this information is made public by a professional accountancy body) and to enable the execution of contract</li> </ul>					
CPAA disciplinary record	<ul style="list-style-type: none"> <li>To effectively enact our disciplinary process and so that we can take a proportionate approach to quality assurance work</li> <li>To enable the effective defence of any legal proceedings resulting from disciplinary actions taken</li> <li>To inform third parties and the public, of any disciplinary action taken against a member, in accordance with the Association's Rules and Bye-Laws</li> <li>This data is processed under legitimate interest (as it is a reasonable expectation that this information is made public by a professional accountancy body)</li> </ul>			Indefinitely as this allows the Association to; maintain justifications for terminating a person's membership; provide due diligence information to other organisations; review and monitor the effectiveness of its disciplinary processed. For applicants who fail to transition to members this information is retained for a period of one year.	<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> <li>Provided to members of the public, regulators and law enforcement on request</li> </ul>	
Details of any disciplinary actions taken by other professional bodies	<ul style="list-style-type: none"> <li>To effectively enact our disciplinary process and so that we can take a proportionate approach to quality assurance work</li> <li>To enable the effective defence of any legal proceedings resulting from disciplinary/compliance actions taken</li> <li>To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership</li> <li>This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a member is a fit and proper person) and to enable the execution of contract</li> </ul>			Indefinitely as this allows the Association to maintain justifications for terminating a person's membership. For applicants who fail to transition to members this information is retained for a period of one year.	<ul style="list-style-type: none"> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>	
Details of any County Court Judgments (CCJs) or bankruptcies which have been declared	<ul style="list-style-type: none"> <li>To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership</li> <li>To risk assess the member in accordance with the Association's Rules and Bye-Laws</li> <li>To take a proportionate approach to quality assurance work</li> <li>This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a member is a fit and proper person) and to enable the execution of contract</li> </ul>				<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> <li>Provided to regulators and law enforcement on request</li> </ul>	

Details of relevant qualifications achieved/held	<ul style="list-style-type: none"> <li>To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership</li> <li>This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a member meets the Association's requirements for membership) and to enable the execution of contract</li> </ul>			Indefinitely, as this allows the Association to maintain and identify past members, which it needs to do in the public interest.	<ul style="list-style-type: none"> <li>Provided to regulators and law enforcement on request</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
Details of Professional Indemnity Insurance				Indefinitely, as this information may need to be referred back to in the event that there is an issue relating to the Association's group insurance scheme. For applicants who fail to transition to members this information is retained for a period of one year.	<ul style="list-style-type: none"> <li>Provided to members of the public regulators and law enforcement on request</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
Agreement to Statement of Fact (SoF) (if on CPAA group insurance scheme)	<ul style="list-style-type: none"> <li>To enable the member to be enrolled on the group insurance scheme, a requirement of the insurers</li> </ul>				<ul style="list-style-type: none"> <li>Buckland Harvester</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
PAYE reference number (if on CPAA group insurance scheme)	<ul style="list-style-type: none"> <li>This data is processed to enable the execution of contract</li> </ul>						
Details of other businesses interests	<ul style="list-style-type: none"> <li>To take a proportionate approach to quality assurance work</li> <li>To help to identify the member</li> <li>To better understand the members position and risks associated with the member</li> <li>This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to understand the other business interests of a member to adequately risk assess them and to take a proportioned approach to regulation and quality assurance work, in the public interest)</li> </ul>			Indefinitely, as this allows the Association to maintain and identify past members, which it needs to do in the public interest. For applicants who fail to transition to members this information is retained for a period of one year.	<ul style="list-style-type: none"> <li>Provided to regulators and law enforcement on request</li> <li>From time to time, where relevant, the Association's appointed solicitors or legal representatives</li> </ul>		
Payment history with CPAA (for example missed subscriptions)	<ul style="list-style-type: none"> <li>To enforce the Association's Rules and Bye-Laws, and any applicable procedures relating to missed/lapsed payments/subscriptions</li> <li>This data is processed under legitimate interest</li> </ul>			Indefinitely as the Association may need to justify why an individual's membership was terminated, or the information maybe taken into account if the individual wishes to re-join. Where there are no issues with payment any records will be deleted once the individual ceases to be a member.	N/a	Canada	
Bank Account/Payment Card Details	<ul style="list-style-type: none"> <li>To process payments including monthly direct debits where applicable</li> </ul>	Card details are processed through secure trading.	The Association's Financial Controller. Other employees of the Association where there is a valid reason for access.	Card details are deleted after processing. Bank account details are deleted after a direct	<ul style="list-style-type: none"> <li>BACS</li> <li>Relevant Bank/Building Society</li> </ul>	No	N/a

	<ul style="list-style-type: none"><li>This data is processed under legitimate interest and to enable the execution of contract</li></ul>	Bank account details are stored on BACs and locally on a password protected computer. Bank account details are from time to time kept on direct debit mandate forms, though these are sent to the applicable bank/building society without delay.		debit is no longer needed.			
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