

# Privacy Policy

## 1. PURPOSE OF THIS NOTICE

The notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following notice carefully to understand our practises regarding your personal data and how we will treat it.

## 2. TERMS

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to); names and contact information i.e. emails and telephone numbers; National Insurance numbers; employment history; employee numbers; credit history; personal tax; payroll and accounting data.

### What is a Data Controller?

The 'data controller' is the person or organisation who decides the purposes for which and the way in which any personal data is processed. For the purpose of the Data Protection Legislation and this notice, the data controller is **Horizon FD Services Ltd**. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

### What is a Data Processor?

A "data processor" is a person or organisation which processes personal data for the controller. What is Data Processing? Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

## 3. HOW AND WHAT INFORMATION WE MAY COLLECT ABOUT YOU

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you engage us to provide our services and also during the provision of those services;
- you contact us through our web contact forms, email, telephone, post, or other method of communication;
- from third parties and publicly available resources (for example, from Companies House).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services (as defined in our Letter of Engagement and supporting Schedules) and for other related purposes including:

Information Category	What does this include? (may include but not limited to)	How is this collected / sourced?	Legal basis for processing
Usage data	IP address, location, browser type and version, operating system, length of visit, page views, frequency and pattern of website use.	Interserver Inc. - please see cookie policy section later in this document	Legitimate interests - monitoring and improving our website and services
Account and contact data	Name and email address, feedback and survey responses, your interests and preferences, billing address, delivery address and telephone numbers	You or your employer, collected via various means	Legitimate interests - improving our services, and monitoring users
Service data	any data in relation to the services you have contracted us to provide e.g. HMRC reference numbers	You or your employer, collected via various means	Contract
Enquiry data	Any data you provide relating to the services you are interested in, and your business or personal circumstances	You or your employer	Consent
Transaction data	Contact details, card (account) details, details about payments to and from you and other details of products and services you have purchased from us	You or your employer	Contract and legitimate interests (namely the proper administration of our business)
Sensory data	Audio recordings	You, collected by camera & microphone	Consent – for legitimate interests (namely the proper administration of our business)
Correspondence data	Your email preferences including receiving marketing information from us, your communication preferences	You or your employer	Consent and legitimate interests (educational content)

We may process your data for:

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention
- Notifying you about any changes to our services

We additionally collect information during the browsing and purchasing process of merchandise through our store.

When you make a purchase or attempt to make a purchase of merchandise through horizonfd.com we'll ask you to provide information including your name, billing address, shipping address, email address, phone number, credit card/payment details and optional account information like username and password. We'll use this information for purposes such as to:

- Send you information about your account and order;
- Respond to your requests, including refunds and complaints;
- Process payments and prevent fraud;
- Set up your account for our store;
- Comply with any legal obligations we have, such as calculating taxes;
- Improve our store offerings and
- Send you marketing messages, if you choose to receive them.

If you create an account, we will store your name, address, email and phone number, which will be used to populate the checkout for future orders. We will also store comments or reviews if you choose to leave them. Additionally, we use cookies to keep track of cart contents while you're browsing the site.

#### **4. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU**

We may process your personal data to comply with our legal obligations, and most commonly to enable us to perform the Services you have contracted for us to provide.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

## **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

## **Communications and Marketing**

We will periodically send you free newsletters, promote educational content, and send emails that directly promote the use of our Platform, or Services.

Promotion of educational content may include new products and/or service offerings of associated third parties, and webinars hosted by ourselves or in partnership with an associated third party, that we believe you may benefit from.

When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the email you receive or by contacting us directly via [admin@horizonfd.com](mailto:admin@horizonfd.com).

Despite your indicated email preferences, we may send you Service related communications, including notices of any updates to our Terms of Use or Privacy Policy in line with this notice.

## **5. COOKIES**

A cookie is an identifier file containing a string of letters and numbers that is sent from a web server to a web browser. The file is stored on the browser, and returned to the server each time access to a page on the server is requested i.e., each time you revisit a website.

Although cookies do not typically store personally identifiable information, personal information held by us may be linked to cookies stored on your browser.

You may refuse to accept browser cookies by activating the appropriate setting on your browser, with the caveat that some features of horizonfd.com may be affected or inaccessible upon doing so. See our [cookie policy](#) for further detail.

For more information on what cookies are and how to enable, disable, clear, and delete cookies, visit: <https://www.allaboutcookies.org/cookies/>

### **Cookies used by our service providers**

This Privacy Policy applies only to your use of our website. Our service providers use cookies which may be stored on your computer when you visit their websites(s). We are not responsible for the cookies used by these providers; however each provider will have their own cookie policy available to view on their website.

Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## **6. DATA SHARING**

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations (financial institutions, Government agencies etc) for the purposes of completing tasks and providing the Services to you on our behalf.

'Third Parties' includes third-party service providers which includes accounts processing software and email providers. Please see Appendix A for a list of third-party software providers used internally by Horizon FD Services Ltd.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data.

We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We will not share your information for marketing purposes with companies so that they may offer you their products and services, unless expressly permitted by you.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## **7. DATA SECURITY**

We have put in place commercially reasonable and 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.

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

### **Transferring your information outside of Europe**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring safeguards are implemented. Please note, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Security precautions in place about data collected**

When you give us personal information, we take steps to make sure that it's treated securely. Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

## **8. DATA RETENTION**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **Change of Purpose**

Where we need to use your personal data for another reason, other than for the purpose for which it was collected, we will only use your personal data where that reason is compatible with the original purpose. Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good or legal reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claim.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you wish to exercise any of the above rights, please email [admin@horizonfd.com](mailto:admin@horizonfd.com). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to

withdraw your consent for that specific processing at any time. To withdraw your consent, please email [admin@horizonfd.com](mailto:admin@horizonfd.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be provided to you.

This privacy notice is dated 15th March 2023.

## 12. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email [admin@horizonfd.com](mailto:admin@horizonfd.com).

We are a limited company registered in England and Wales under registration number 14500004, and our registered office address is at 124 City Road, London, EC1V 2NX. Please note the registered office address is not for correspondence purposes.

**You can contact us regarding this policy notice:**

- using our website contact form;
- by email, using the email address published on our website privacy policy.

This website is owned and operated by Horizon FD Services Ltd.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. You can do this through the ICO website: <https://ico.org.uk/concerns/>

Horizon FD Services Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, and only collect and use your personal data as described in this Privacy Policy. Any personal data we collect will only be used as permitted by law.

**APPENDIX A - Third Party Service Providers and Partners of Horizon FD Services Ltd**

BrightPay	<a href="https://www.brightpay.co.uk/pages/privacy-policy/">https://www.brightpay.co.uk/pages/privacy-policy/</a>
Cal.com	<a href="https://cal.com/privacy">https://cal.com/privacy</a>
DocuSign	<a href="https://www.docusign.com/company/privacy-policy">https://www.docusign.com/company/privacy-policy</a>
Daily.co	<a href="https://www.daily.co/legal/privacy/">https://www.daily.co/legal/privacy/</a>
Fathom	<a href="https://www.fathomhq.com/privacy">https://www.fathomhq.com/privacy</a>
Float	<a href="https://floatapp.com/privacy-policy/">https://floatapp.com/privacy-policy/</a>
Free Agent	<a href="https://www.freeagent.com/website/privacy/">https://www.freeagent.com/website/privacy/</a>
Futrli	<a href="https://www.futrli.com/privacy-policy/">https://www.futrli.com/privacy-policy/</a>
Go Cardless	<a href="https://gocardless.com/security/">https://gocardless.com/security/</a>
Interserver	<a href="https://www.interserver.net/privacy-policy">https://www.interserver.net/privacy-policy</a>
Google	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Government UK Digital Services	<a href="https://www.gov.uk/help/privacy-policy">https://www.gov.uk/help/privacy-policy</a>
Paypal	<a href="https://www.paypal.com/myaccount/privacy/privacyhub">https://www.paypal.com/myaccount/privacy/privacyhub</a>
Quikbooks	<a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>
Starling Bank	<a href="https://www.starlingbank.com/legal/privacy-notice/">https://www.starlingbank.com/legal/privacy-notice/</a>
Stripe	<a href="https://stripe.com/gb/privacy">https://stripe.com/gb/privacy</a>
Xama	<a href="https://xamatech.com/privacy-policy/">https://xamatech.com/privacy-policy/</a>
Xero	<a href="https://www.xero.com/uk/about/terms/privacy/">https://www.xero.com/uk/about/terms/privacy/</a>
Zoom	<a href="https://explore.zoom.us/en/privacy/">https://explore.zoom.us/en/privacy/</a>