

Privacy Notice for Clients

This privacy notice describes why and how I collect and use personal data related to my work with my clients ("you") and provides information about your rights.

Identity and contact details of the controller	Michelle Butler (trading as Insolvency Oracle): <ul style="list-style-type: none">• insolvencyoracle@pobox.com• (+44) 07704 887325• For a postal address, please contact me by email
What personal data I hold	In contracting with you and providing the services agreed, I will acquire data about you (name, address, email address and related identifiers). For compliance reviews and for assisting with technical queries, I will also receive information relating to your case-work, which will include names, addresses and personal details of the people involved in insolvency proceedings. Although it may be necessary for you to provide to me certain special category data to enable me to carry out my work, I will endeavour to ensure that my records do not contain such data for longer than is necessary.
Who provided the personal data	This data is derived primarily from you. To provide the services to you, I also access information from the Registrar of Companies and other similar public-access data providers, which is processed and stored alongside data received from you.
How I use the personal data	I plan to use the personal data solely to provide the services set out in the engagement. However, it may also be necessary to process data to prevent or detect crime, fraud or corruption or to defend or take legal actions related to the provision of my services.
Lawful basis for the processing	<p>I need to process the data to meet the terms of my engagement with you.</p> <p>I also have a legitimate interest in examining the data in order to provide the best quality service I can reasonably achieve. It is also in your and my legitimate interests to retain the data for the periods described below so that I may assist you if you have reason to ask me about the service provided after completion and to defend or take legal actions should the need arise.</p>
With whom I share the data	The data is confidential between you and me and is only used to provide the services set out in the engagement. However, in exceptional circumstances it may be necessary to share data with my professional advisers or with law enforcement or other government or regulatory agencies.

<p>How long I retain the personal data</p>	<p>In relation to compliance reviews, I intend to destroy correspondence and other papers (in print and electronic format) that I store after more than six years have passed since the review was completed, unless I consider them to be of continuing significance (e.g. they are relevant to subsequent engagements or necessary for legal or regulatory purposes). Similarly, unless there are reasons to keep emails for longer, I intend to delete all emails after six years have passed.</p>
<p>Your rights</p>	<p>Access to your data – You have the right to request a copy of the personal data about you that I hold.</p> <p>Correcting your data – You may ask me to correct any personal data that I hold.</p> <p>Deletion of your data – You have the right to ask me to delete personal data about you where:</p> <ul style="list-style-type: none"> • You consider that I no longer require the data for the purposes for which it was obtained. • I am using that data with your consent and you have withdrawn your consent – see <i>Withdrawing consent to using your information</i> below. • You have validly objected to my use of your personal data – see <i>Objecting to how I may use your information</i> below. • My use of your personal data is contrary to law or my other legal obligations. <p>Objecting to how I may use your data – You have the right at any time to require me to stop using your personal data for direct marketing purposes (although I will not use the data for this purpose in any event). In addition, although I do not envisage using your personal data to perform tasks carried out in the public interest, if I were to, then if you asked me to, I would stop using that personal data unless there were overriding legitimate grounds to continue.</p> <p>Restricting how I may use your data – In some cases, you may ask me to restrict how I use your personal data. This right might apply, for example, where I am checking the accuracy of personal data about you that I hold or assessing the validity of any objection you have made to my use of your data. The right might also apply where this is no longer a basis for using your personal data but you do not want me to delete the data. Where this right is validly exercised, I may only use the relevant personal data with your consent, for legal claims or where there are other public interest grounds to do so.</p>

	<p><i>Withdrawing consent to the use of your data</i> – Where I use your personal data with your consent, you may withdraw that consent at any time and I will stop using your personal data for the purpose(s) for which consent was given.</p> <p>Please contact me in any of the ways set out at the top of this document, if you wish to exercise any of these rights.</p>
Changes to my privacy notice	<p>I will place any updates to this privacy notice on this website. Paper copies of this privacy notice may also be obtained by emailing me at insolvencyoracle@pobox.com.</p> <p>This privacy notice was last updated on 30 December 2020.</p>
Complaints	<p>Should you want to complain about my use of personal data, please contact me at insolvencyoracle@pobox.com.</p> <p>You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website.</p>