



The Institute of Certified Bookkeepers

PRIVACY NOTICE

Our organization, the Institute of Certified Bookkeepers and its affiliated entities (together “ICB”, ‘us’ or ‘we’), is dedicated to protecting your information in accordance with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act of 2018. We ensure that information collected is handled responsibly and safeguarded using appropriate technical, administrative and physical security measures.

We are required by law to be fair in notifying individuals (“you”) on how your information will be managed and to inform you of your rights.

The privacy notice below explains what information we gather about you, what we use it for and who we share it with. It also sets out your rights and who you can contact for more information or queries.

Our contact details:

Name: The Institute of Certified Bookkeepers
Address: 122-126 Tooley Street, London, SE1 2TU
Phone Number: 02034054000
E-mail: Professionalstandards@bookkeepers.org.uk

Data Controller

ICB is a registered Data Controller (Registration Number: **ZA048757**) with the Information Commissioners Office (ICO). We are committed to processing personal data in accordance with our obligations under the GDPR and the UK Data Protection Act 2018 (DPA2018).

What personal data we collect

We may collect, record and use your personal data in physical and electronic form, and will hold, use and otherwise process that data in line with the Data Protection Legislation and as set out in this statement.

The personal data we process may include:

- Name, gender, age, date of birth and country of residence;
- Contact information, such as address, email, and mobile phone number;
- Details of your interests and areas of study;
- Employment details (for example, the organisation you work for, and your job title);
- Your qualifications (awarded or anticipated), education history, skills, and work experience;
- Details of attendance at events and photographic images;
- General correspondence and administration in relation to your enquiry or application that include any other information you choose to share with us;
- Your personal views, opinions and other types of feedback related to ICB and your experiences;
- Postings or messages on any blogs, forums, platforms, wikis or social media applications and services that we provide (including with third parties);
- Information associated with you and provided through your device, or that you have made publicly available to us through social media;
- Information regarding any complaints you make;
- CCTV footage and other information we collect when you access our premises;
- IP address, browser type and language, your access times

Special Category Data

This includes information about a person's race, ethnicity, political opinions, convictions, religion, trade union membership, physical and/or mental health, and sexual preference. Sensitive Personal Data can only be processed with the express consent of the person concerned.

How we get the personal information

Directly: We obtain personal data directly from individuals in a variety of ways, including obtaining personal data via our website, for example, when individuals complete our student/membership registration form, purchase products, register for webinars and events, and subscribe to our newsletters.

We may also obtain personal data directly when, for example, we are establishing a business relationship, when we receive postal application forms for practice licence registrations and membership applications/registrations, when you attend meetings or events we host, or visit our offices.

Indirectly. We obtain personal data indirectly about individuals from a variety of sources, including Training providers. We may attach personal data to our customer relationship management system to better understand and serve our students or members, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.

- Training Providers – Personal data may be collected from Training providers when registering with us as students or members or booking exams.
- Public sources – Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.

- Social and professional networking sites – If you register or login to our websites using social media (e.g. LinkedIn, Facebook or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That information may include your name and email address and depending on your privacy settings, additional details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.
- HMRC – We may obtain information from Her Majesty's Revenue and Customs (HMRC) regarding Anti Money Laundering (AML) Compliance.

The lawful basis for Processing

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting us on Professionalstandards@bookkeepers.org.uk
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

Why we have your personal information

ICB will only collect and process your Personal Data to the extent that it is needed to fulfil ICB's operational and contractual needs or to comply with any legal requirements.

ICB shall access and use your Personal Data in accordance with your instructions and as is reasonably necessary:

1. As an Anti-Money Laundering Supervisor; to provide, maintain and improve ICB's services to you and its members and to fulfil its role and obligations.
2. As a Licensor; to provide, maintain and improve ICB's services to you and its members and to fulfil its role and obligations.
3. Regulator; to provide, maintain and improve ICB's services to you and its members and to fulfil its role and obligations.
4. As an Educational Institute; to provide, maintain and improve ICB's services.
5. As a Membership Body; to provide, maintain and improve ICB's services to you and its members and to fulfil its role and obligations.
6. For the purposes of advertising and Marketing the services of ICB affiliates and other bodies associated with the bookkeeping/accountancy sector. Advertising and Marketing does not include ICB informing its current and expired members about changes to

legislation, news, events, new features to ICB's services and security, fraud or other related notices, which ICB classifies as Notifications*.

You are entitled to opt out of receiving “Advertising and Marketing” and Non-Essential Notifications received from ICB at any time by notifying ICB in writing or updating your privacy settings.

7. To respond to your requests, queries and problems.
8. To administer licensees accounts, invoicing and to keep track of billing and payments. For the above items 1, 2, 3 and 7 ICB shall process Personal Data on the basis that it is exercising its official authority derived from the Money Laundering Regulations 2007 and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) and/or the fact that the processing is necessary for ICB to comply with its legal obligations.

For the above items 3, 4, 5, 7 and 8 ICB shall process Personal Data on the basis that the processing is necessary for the performance of a contract for which the data subject is party or the fact that the processing is necessary for the purposes of a legitimate interest.

For the above item 6, ICB shall process the Personal Data of its members and non-members for Advertising and Marketing only with their express consent. Advertising and Marketing may include the selling of your personal data to unrelated third parties/companies which provide accounting/bookkeeping services and products and/or ICB using your personal data to implement targeted marketing of third party services and products.

* “Advertising and Marketing” is different to “Notifications”. ICB shall process the Personal Data of its members and non-members for “Notifications” on the basis that there is a legitimate interest or it is required in order for ICB to fulfil its other legal obligations.

Notifications are how ICB keeps its members and non-members up-to date with the developments and changes to legislation which affect bookkeeping and which can prevent you from acting unlawfully or being complicit in an unlawful act. These Notifications also enable ICB to assist bookkeepers in providing an effective and secure service to their employers and/or clients.

One of the ways ICB notifies its members and non-members of these developments is by sending ICB members and non-members Newsletters and/or details of ICB events. You are entitled to opt out of receiving these particular notifications.

ICB strongly recommends that you do not opt out of receiving Notifications as if you do ICB will no longer be able to ensure that you are kept abreast of the current legal requirements and issues surrounding bookkeeping.

You are entitled to opt out of receiving “Advertising and Marketing” and/or the ICB Newsletter. and/or ICB events from ICB at any time by notifying ICB.

Cookies

ICB's website uses Cookies which may be stored on your computer whilst you visit. Cookies are small text files that help ensure ICB's website works effectively. The Cookies provide ICB with aggregated information concerning the number of people who have visited the website and the items which have generated interest. This information helps ICB respond to its members' and non-members' concerns and plan guidance and initiatives. ICB does not use cookies in any other way and the cookies do not identify you personally. Most of ICB's cookies will be deleted from your computer when you exit the website.

ICB also utilises a Facebook and Twitter platform and often shares content from its events, conferences and seminars. If you visit these platforms Twitter and/or Facebook may store cookies on your computer. ICB has no control over how these third parties may use your cookies. If you have concerns about these platforms, ICB recommends you familiarise yourself with the privacy policies of both [Twitter](#) and [Facebook](#).

When ICB May Share Personal Data

There are times when ICB may need to share your Personal Data. This section discusses how and where ICB may share your information.

In the course of ICB fulfilling its role of Anti-Money Laundering Supervisor, Licensor, Regulator, Membership Body, Awarding Body and Educational Institute it may be necessary for ICB to disclose your Personal Data in certain situations:

In ICB's Licensing, Regulatory and Anti-Money Laundering Supervising role, ICB may need to share your Personal Data with other supervisors, regulators, legal, governmental and other relevant bodies including HMRC, HMT, OPBAS, FCA and the NCA.

In ICB's Regulatory role, ICB may also need to share your Personal Data with a current or former client, employer or other relevant organisation.

In ICB's role as an Educational Institute, ICB may need to share your Personal Data with education/training providers, examiners, and examining boards and other educational institutes.

If ICB is under a duty to disclose or share your Personal Data in order to comply with any legal obligation, lawful requests, court orders and legal process.

To enforce or apply any contract or other agreement with you.

Upon receiving your express consent that ICB may disclose the data to a third party.

To protect ICB's rights, property, or safety and that of its employees, members, or others, in the course of investigating and preventing Bribery and Corruption, the facilitation of tax-evasion, money laundering and fraud.

How we store your personal information

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. Access to data is limited to ICB employees, agents, contractors, or third parties that are authorised to work on our behalf, for example where storage solutions and IT systems are outsourced to third party providers. Where processing takes place with an external third party, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure.

Where applicable, any credit/debit card details provided will be stored in full compliance with PCI-DSS requirements.

How long do we hold personal data?

Personal data is retained for as long as it is required to fulfil the purpose for which it is held and then to fulfil any legal requirements. Details of the retention periods for each type of processing activity is detailed in our retention schedule which is available on our website here. This can be summarised as:

- Unsuccessful applicant's data will be retained for 5 years to support any subsequent application.
- We will keep our member's information for as long as they are a member with ICB. When you stop being a member, your information will be retained for 5 years.

We may keep data for longer if required to do so for legal reasons, or for limited research for statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Professionalstandards@bookkeepers.org.uk or call us on 02034054000 and 122-126 Tooley Street, London, SE1 2TU if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Professionalstandards@bookkeepers.org.uk .You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>