SH PROFESSIONAL SERVICES

Ref: SHPRCO012

Privacy Notice for Clients

How SH Professional Services Ltd collects and uses personal data

Approved by: Board & RCO Committee | Version: 1.1 | Effective date: 1 October 2026 | Next review: 1 October 2027

This notice explains how SH Professional Services Ltd (we, us, our) collects, uses, shares and protects personal data about our clients and the individuals connected with them. We are committed to protecting personal data and handling it in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who we are

SH Professional Services Ltd is a company registered in England and Wales (company number 15914303), with its registered office at 93 High Street, Tewkesbury, GL20 5JZ. We are registered with the Information Commissioner's Office (ICO) under registration number ZC200724.

For the personal data described in this notice we act as a controller, meaning we decide how and why it is processed. Where we process personal data on your behalf as part of a service (for example payroll, bookkeeping, or handling data subject requests), we act as your processor; that processing is governed by the relevant Call-off Contract and any data processing terms within it, and not by this notice.

If you have any questions about this notice or how we handle personal data, please contact us at rco@tlam.co.uk, marked for the attention of our Data Protection Officer.

2. The personal data we collect

Depending on the services we provide to you, we may collect and process:

- identity and contact details of you and the individuals connected with your business (names, job titles, email addresses, telephone numbers, postal addresses);
- identification and verification data we are required to obtain for anti-money laundering purposes (for example identity documents, proof of address, and information about beneficial owners and the source of funds or wealth);
- financial, accounting, tax and payroll information relating to you and your business;
- correspondence and records of our dealings with you; and
- information we need to provide a particular service, as described in the relevant engagement documentation.

Some of the data we handle for anti-money laundering checks, or in the course of certain services, may include special category data or data about criminal convictions and offences. We only process such data where the law allows us to and where it is necessary for the service or our legal obligations.

3. How we use personal data and our lawful bases

We use personal data to provide our services, manage our relationship with you, and meet our legal and regulatory obligations. We rely on the following lawful bases under the UK GDPR:

- Contract: to perform our engagement with you and take steps at your request before entering into it.
- Legal obligation: to comply with duties imposed on us, including anti-money laundering, tax, accounting and other regulatory requirements.

- Legitimate interests: to administer and improve our services, manage risk, keep records, and pursue or defend legal claims, where those interests are not overridden by your rights.
- Consent: where we ask for it for a specific purpose; you may withdraw consent at any time.

Where we process special category or criminal offence data, we additionally rely on the substantial public interest, legal claims, or other appropriate conditions permitted by law, including the prevention of money laundering.

4. Who we share personal data with

We may share personal data with:

- HM Revenue & Customs, Companies House, and other regulators, authorities and supervisory bodies where required;
- the National Crime Agency, where we are required to make a report;
- our professional advisers, insurers and auditors;
- service providers and software tools that support the delivery of our services (for example secure document, accounting and e-discovery platforms), who are bound to protect the data; and
- a third party in connection with a reorganisation, sale or restructuring of our business.

We do not sell personal data.

5. International transfers

Where personal data is transferred outside the United Kingdom (for example because a service provider is located abroad), we ensure an appropriate safeguard is in place, such as an adequacy decision or the International Data Transfer Agreement or equivalent standard contractual clauses.

6. How long we keep personal data

We keep personal data only for as long as necessary for the purposes for which it was collected and to meet our legal and regulatory obligations. In particular, we retain records obtained for anti-money laundering purposes for five years from the end of our business relationship or the completion of a transaction, and we retain accounting and tax records for the periods required by law. Where there is no specific legal retention period, we keep data for as long as needed for the relevant service and a reasonable period afterwards.

7. Your rights

Subject to certain conditions and exemptions, you have the right to:

- be informed about how we use personal data;
- request access to the personal data we hold about you;
- request that inaccurate data be corrected;
- request erasure of data in certain circumstances;
- restrict or object to our processing in certain circumstances;
- request portability of certain data; and
- withdraw consent where we rely on it.

Some of these rights are limited where we are required to keep the data by law, for example for anti-money laundering or tax purposes. To exercise any right, please contact us at rco@tlam.co.uk.

8. Complaints

If you have a concern about how we handle personal data, please contact us first so we can try to resolve it. You also have the right to complain to the Information Commissioner's Office at ico.org.uk, by calling 0303 123 1113, or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

9. Changes to this notice

We may update this notice from time to time. The current version is available at [portal URL] and the effective date is shown above.