Gravita Privacy Policy

Welcome to the Gravita privacy policy.

Gravita respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or you otherwise deal with us and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Gravita collects and processes your personal data through your use of our website, when you or your employer purchase services from or provide services to us, or otherwise contact or deal with us.

Our website and our services are not intended for children. However, we may collect and process personal data regarding children where they are dependents of a client.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

This privacy policy is issued on behalf of the Gravita Group so when we mention Gravita, "we", "us" or "our" in this privacy policy, we are referring to one of the following companies in the Gravita Group which is the controller responsible for processing your data:

- Gravita Business Services Limited
- Gravita Business Services ll Limited
- Gravita Audit Limited
- Gravita Audit ll Limited
- Gravita (AH) Limited
- Gravita ll LLP
- Gravita III LLP
- Gravita Essex Limited
- Gravita Probate Limited
- Gravita Trustees Limited
- Gravita Trustees II Limited

If you are not sure which member of the Gravita Group is responsible for processing your data, please contact us using the details below. Gravita Business Services Limited is the controller responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Gravita Business Services Limited

Email address: hello@gravita.com

Postal address: Aldgate Tower, 2 Leman Street, London E1 8FA

Telephone number: 020 7330 0000

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under review and may update it from time to time. This version was last updated on 26 June 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We also have a social media presence for the purpose of engaging with you.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, or interact with us on social media, we encourage you to read the privacy policy of each website or forum that you visit or use.

When this policy applies

This Policy applies where Gravita is the controller of personal data.

Gravita also acts as a processor for its clients. Where Gravita is a processor, we process data in accordance with our client's lawful instructions and the terms of our agreement with the client. If you interact with our service through one of our clients, please refer to their privacy notice for information on how your data is collected and processed.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where our ability to identify that person has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** means first name, maiden name, last name, marital status, title, date of birth and gender, passport details (or other similar form of identification), photographs (by way of identification) and (where you are the representative or employee of a business or organisation) your job title and the name of that business or organisation.
- **Contact Data** means billing address, and business or personal contact information which is your address, email address and telephone numbers.
- **Third Party Data** means details of your dependents or beneficiaries, and your next of kin.
- **Financial Data** means information regarding your salary (or details of other income), payroll records, details regarding your investments or personal tax arrangements pension details and benefits information, your national insurance number or other Governing Body reference number, bank account and credit card details, bank statements and other personal financial details that are relevant to our work.
- **Transaction Data** means credit reference or other background checks, details about payments to and from you or your employer, and other details of services you or your employer have purchased from us.

- **Technical Data** means internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** means information about how you use our website and services including the URL clickstream to, through and from our site (including date and time); pages, resources and/or products you viewed or searched for; page response times, errors, length of visits to certain pages, page interaction, and methods used to browse away from the page, and information about your interaction with our emails, including whether you have opened the email, the number of times the email is accessed, and your interaction with email content including the links you have clicked.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you or your employer, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or your employer (for example, to provide you or your employer with products or services). In this case, we may have to amend the contract (or delay or cancel provision of the affected product or service), but we will notify you if this is the case at the time.

3.How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Third Party and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - apply for our products or services;
    - subscribe to our service or publications;
    - request marketing to be sent to you;
    - complete a survey; or
    - give us feedback or contact us.

- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:
    - Technical Data from the following parties:
        - analytics providers such as Google (both in and outside the UK);
        - advertising networks
        - search information providers
        - sub-contractors providing technical, payment and delivery services
        - business partners
    - Identity, Contact and Financial Data from publicly available sources such as:
        - Companies House
        - credit reference bureaus
        - Smart Search
        - HMRC

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you or your employer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Click hereto find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Where you are a prospective or existing client or are the representative or employee of a client:

Where you are a prospective or existing client or the representative or employee of a client, we will process your personal data for the purposes set out in the table below:

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you or your employer as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (where we are required to verify your identity) (c) Necessary for our legitimate interests (in order to perform a contract with your employer)
To deliver our services to you or your employer including: (a) to liaise with HMRC, pension providers, insurance providers and underwriters, banks, legal advisers and benefits providers on your behalf; (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Third Party (d) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contact with your employer) (c) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you or your employer which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (in order to perform a contract with your employer) (d) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Usage	Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you	(a) Identity (b) Contact (c) Usage (d) Technical	Necessary for our legitimate interests (to study how clients use our products and services, to develop them, to grow our business)
To use data analytics to improve our website, products/services, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you or your employer	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

Where you are a prospective or existing client or are the representative or employee of a client:

Where you are a prospective or existing client or the representative or employee of a client, we will process your personal data for the purposes set out in the table below:

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To conduct supplier due diligence	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)
To register you or your employer as a supplier	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)

To make payments to you or your employer	(a) Contact (b) Identity	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer)
To manage our relationship with you or your employer which will include: (a) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey	(a) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer) (c) Necessary to comply with a legal obligation
To deliver relevant website content to you.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in order to perform a contract with your employer) (c) Necessary for our legitimate interests (to study how suppliers engage with our website).
To use data analytics to improve our products/services, supplier relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of suppliers for our products and services and to develop our business)

Marketing

Promotional information from us

You will receive communications from us or about our services if you or your employer have requested such information from us, and you have not opted out of receiving that information.

Third-party marketing

We do not share your personal data with third parties for marketing purposes, and do not send third party marketing on behalf of any other business.

Opting Out

You can ask us or third parties to stop sending you or contacting you with marketing messages at any time by contacting us or selecting the relevant opt-outs on our marketing forms.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, but otherwise in compliance with this privacy policy, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties which are other companies in the Gravita Group acting as controllers or processors and who are based in the UK for group wide services.
- External Third Parties such as pension providers, insurance providers and underwriters, banks or other related third parties based in and outside the UK in order to deliver our services to you or your employer.
- External Third Parties which are service providers acting as processors based in and outside the UK who provide services such as travel, insurance and IT services.
- Authorities and regulators, such as HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in and outside the UK who require reporting of processing activities in certain circumstances.
- Professional advisers including lawyers, bankers, auditors and insurers acting as processors or controllers based in and outside the UK who require reporting of processing activities in certain circumstances or who process your personal data for the purpose of delivering their services to us.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow any third-party service providers who are acting as processor for us to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If you require any further information about third parties with whom we may share your personal data, please contact us.

6. International transfers

Whenever we transfer your personal data out of the UK, whether to an external third party or a company in the Gravita Group, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

We may use specific contracts approved for use in the UK which give personal data the same level of protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

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

8.Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in relation to which your personal data is relevant.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

9.Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Please click on the links below to find out more about these rights:

Request access to your personal data.

Request correction of your personal data.

Request erasure of your personal data.

Object to processing of your personal data.

Request restriction of processing your personal data.

Request transfer of your personal data.

Right to withdraw consent.

If you wish to exercise any of your rights set out above, please contact us.

No fee usually required

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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Your Legal Rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
    - If you want us to establish the data's accuracy.
    - Where our use of the data is unlawful but you do not want us to erase it.
    - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it/

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Gravita is a trading name of: Gravita Business Services Limited, Gravita II LLP, Gravita AH Limited, Gravita III LLP and Gravita Essex Ltd.
Gravita Audit is a trading name of: Gravita Audit Limited, Gravita Audit II Limited, Gravita II LLP and Gravita Essex Ltd.

- Gravita Business Services Limited. Registered in England and Wales. Company Reg no: 13128469. VAT number 369869417. Regulated for a range of investment business activities by the Institute of Chartered Accountants in England and Wales.
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- Gravita II LLP. Registered in England and Wales. Company Reg no: OC391394. VAT number 232192001. Registered to carry on audit work in the UK and regulated for a range of investment business activities by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at www.auditregister.org.uk under reference number C003814750.
- Gravita lll LLP. Registered in England and Wales. Company Reg no: OC342571. VAT number 946638187. Regulated for a range of investment business activities by the Institute of Chartered Accountants in England and Wales.
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- Gravita Audit Limited. Registered in England and Wales. Company Reg no: 13172931. VAT number 374306694. Registered to carry on audit work in the UK and regulated for a range of investment business activities by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at www.auditregister.org.uk under reference number C008924259.
- Gravita Audit ll Limited. Registered in England and Wales. Company Reg no: 11545093. VAT number 324226531. Registered to carry on audit work in the UK by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at www.auditregister.org.uk under reference number C006293724.

The registered office of all of the above entities (excluding Gravita Essex Limited) is Aldgate Tower, 2 Leman Street, London E1 8FA.
The registered office of Gravita Essex Limited is Treviot House 186-192 High Road, Ilford, Essex IG1 1LR.
A list of Directors or Members of the respective entities is available for inspection at the registered office.
The term 'Board Director' is used to refer to a statutory director and principal of the above-named companies as registered at Companies House. The term 'Member' is used to refer to a statutory member and principal of any of the above-named limited liability partnerships as registered at Companies House. Any other designations that include the term 'Partner' or 'Director' are not necessarily registered statutory directors or principals of the registered entities.
The information contained here is necessarily of a general nature. Specific advice should be sought for specific situations. DFK International provides co-ordinating and other services to its member firms in connection with such firm's practices in the fields of accounting, auditing, tax and management advisory services. DFK International does not practice in such fields. Each member firm is independent and is a separate legal, financial and administrative entity, practising under the laws in the country where it is based. Member firms are locally owned, operated and managed and each is responsible for its own liabilities. No single firm is responsible for the services or activities of any other.