

## **Privacy Notice**

### **Xeinadin Limited (UK)**

#### **1. Who We Are**

Xeinadin Limited  
8th Floor Becket House  
36 Old Jewry  
London  
EC2R 8DD  
Registered No. 11354408 (England and Wales)

Email: [data.protection@xeinadin.com](mailto:data.protection@xeinadin.com)

Xeinadin Limited processes personal data in accordance with the UK GDPR, the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR).

#### **2. Our Role as Controller and Processor**

**Data Controller:** We act as a data controller where we determine the purposes and means of processing personal data. This includes the provision of:

- Accountancy services
- Tax advisory and compliance services
- Business advisory services
- Direct services to sole traders, directors and individual clients

In these cases, we are responsible for ensuring compliance with data protection law.

**Data Processor:** We act as a data processor where we process personal data strictly on behalf of a client and under their instructions.

This includes services such as:

- Payroll processing
- Bookkeeping performed under client instruction
- Administrative services where the client determines the purpose of processing

In these circumstances the client (for example, the employer) is the data controller.

We process personal data under a written Data Processing Agreement in accordance with Article 28 UK GDPR.

Individuals whose data we process (e.g. employees) should refer to their employer's privacy notice.

We apply appropriate technical and organisational security measures in both roles.

### **3. Categories of Personal Data**

Depending on the services provided, we may process:

- Identity and Contact Information
- Name, address, email address, telephone number
- National Insurance number or other government identifiers (where legally required)
- Financial and Tax Information
- Bank details
- Payroll data
- Tax returns and supporting documentation
- Accounting records and financial statements
- Income and expenditure information
- Compliance and Verification Data
- Identification documents for AML/KYC purposes
- Due diligence information
- Information required under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and the Proceeds of Crime Act 2002
- Website and Marketing Data
- IP address
- Device and browser information
- Cookie identifiers
- Website usage data

We only process personal data that is necessary for the relevant service or legal requirement.

### **4. Lawful Basis for Processing**

We rely on one or more of the following lawful bases under Article 6 UK GDPR:

- **Performance of a Contract Article 6(1)(b)**  
We process personal data where necessary to fulfil our contractual obligations in providing accountancy, tax, advisory or payroll services requested by our clients. Without this information, we would be unable to deliver the agreed services.
- **Compliance with Legal Obligations Article 6(1)(c)**  
We are required to process certain personal data to comply with UK law, including:
  - HMRC record-keeping requirements
  - The Proceeds of Crime Act 2002
  - The Money Laundering Regulations 2017
  - Companies Act obligations

- Regulatory reporting requirements

Where criminal offence data is processed, it is limited to compliance with anti-money laundering legislation and handled in accordance with the Data Protection Act 2018.

- **Legitimate Interests Article 6(1)(f)**

We process personal data where necessary for our legitimate business interests, provided these interests are not overridden by your rights. These interests include:

- Managing client relationships
- Maintaining IT security, preventing fraud and protecting our business from financial crime
- Internal administration and risk management
- Improving our services
- Limited marketing to business contacts

Where we rely on legitimate interests, we carry out an assessment to ensure that the processing is necessary and that your rights and freedoms are not overridden. You have the right to object to such processing.

- **Consent Article 6(1)(a)**

We rely on consent where required, including:

- Sending marketing communications (where required under the Privacy and Electronic Communications Regulations (PECR))
- Using non-essential cookies
- Certain advertising activities

You may withdraw consent at any time.

## **5. How We Collect Personal Data**

We collect personal data:

- Directly from you
- From employers or authorised representatives
- Through secure client portals
- From HMRC, regulatory bodies or other public authorities where required
- From third parties for compliance purposes, including identity verification and anti-money laundering screening providers
- Through website interactions and cookies

### **Anti-Money Laundering (AML) Screening**

To comply with our obligations under UK anti-money laundering legislation, we may obtain personal data from third-party identity verification and compliance screening providers. This may include verification of identity, sanctions screening, politically exposed person (PEP) checks and other due diligence information.

This processing is carried out to meet our legal obligations and may involve obtaining information from publicly available sources or authorised compliance databases.

## **6. Who We Share Data With**

We may share personal data with:

- HMRC
- Banks and financial institutions
- Accounting and payroll software providers (such as Xero, Sage, QuickBooks, BrightPay)
- Credit reference agencies where required
- Professional advisers and insurers
- Regulators or law enforcement authorities where legally required
- We may contact you by email, telephone or SMS to remind you of outstanding balances. These communications are service-related and not marketing. We may use third-party communication providers to send such reminders on our behalf.
- Where payment remains outstanding, we may also share relevant personal data with regulated firms of solicitors to recover unpaid fees or enforce contractual rights. This processing is based on our legitimate interests and, where applicable, for the establishment, exercise or defence of legal claims.

Where third parties process personal data on our behalf, they are subject to written contractual obligations to process personal data only in accordance with our instructions and to implement appropriate technical and organisational security measures.

Where third parties act as independent data controllers (such as HMRC or financial institutions), they are responsible for complying with their own data protection obligations.

## **7. International Transfers**

Some of our service providers may be located outside the United Kingdom.

Where personal data is transferred outside the UK, we rely on:

- The UK International Data Transfer Agreement (IDTA)
- The UK Addendum to the EU Standard Contractual Clauses
- UK adequacy regulations, where applicable

We conduct transfer risk assessments where required to evaluate whether the destination country provides an essentially equivalent level of protection and implement supplementary measures where necessary.

Further information about international transfers and safeguards is available on request.

## **8. Data Retention**

Client records are generally retained for six years from the end of the relevant accounting period in line with HMRC record-keeping requirements.

Longer retention may apply:

- Where required under anti-money laundering legislation
- For legal claims or dispute resolution
- For legal, tax or regulatory purposes where strictly necessary

Where we act as a data processor (for example in payroll services), retention is determined by our client's instructions and applicable legal requirements.

Data is securely deleted or anonymised once retention periods expire.

## **9. Data Security**

We implement appropriate technical and organisational measures to protect personal data, including:

- Access controls
- Secure cloud infrastructure
- Encryption where appropriate
- Confidentiality obligations for staff

In the event of a notifiable personal data breach, we will comply with reporting obligations under UK GDPR.

## **10. Your Rights**

Under data protection law, you have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure (subject to legal obligations)
- Restrict processing
- Object to processing based on legitimate interests
- Data portability
- Withdraw consent (where applicable)
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights contact: [data.protection@xeinadin.com](mailto:data.protection@xeinadin.com)

We will respond within one month, subject to statutory limits.

You can lodge a complaint with the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk)

## **11. Cookies, Analytics and Advertising**

We use cookies to improve website functionality and performance.

Google Analytics collects device and usage data, including IP address information, to analyse website performance.

We may use hashed contact information to create advertising audiences through Google Ads. This processing is based on our legitimate interests. You have the right to object at any time.

Advertising cookies are only used where you have provided consent.

Further details are available in our [Cookie Policy](#).