

**Date: 25 May 2018**

## **Complete Accounts Limited**

### **Supplementary terms applicable to services provided to clients as data processors**

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#### Data-processing details

For the purposes of data processing you are the **Data Controller** (i.e. you collect, hold and manage the personal information), we are the **Data Processor** (i.e. we process the data as part of HMRC compliance) and you are the **Data Subject** as regards the business identification details and your employee is the Data Subject as regards their personal details

Details are

1. Subject matter of processing  
  
Payroll services -Employee wages and PAYE, submitting employee pay details to HMRC  
  
Auto Enrolment services - Employee auto enrolment pension details
2. Duration of the processing  
  
For each pay period for the length of the engagement
3. Nature and purpose of the processing  
  
To comply with the obligations of the Data Controller
4. Categories of data subjects and types(s) of personal data to be processed  
  
Business data subject:

Name  
Address  
HMRC identification codes  
HMRC tax references  
Auto enrolment pension scheme details

Employee data subject:

Name  
Address  
Date of birth  
NI Number  
E mail address  
Hours worked  
Gender  
Marital status  
Student loan details  
Bank details if paid by BACS  
Student loan type details  
Previous employment details  
Auto enrolment pension details

## Our obligations (as data processor) to you (as data controller)

- a. We will process personal data only on documented instructions from you, including with regard to transfers of personal data to a third country or an international organisation, unless required to do so by EU law or the law of a Member State; in such a case, we shall inform you of that legal requirement before processing, unless the law in question prohibits such information on important grounds of public interest
- b. We will obtain a commitment of confidentiality from anyone we authorise to process the personal data, unless they are already under a statutory obligation of confidentiality
- c. We will not engage another processor without your prior written consent. If you provide such consent, we will only engage another processor in compliance with the requirements of Article 28(2) and 28(4) of the GDPR
- d. Insofar as is possible, we will assist you in fulfilling your obligations to data subjects under chapter III of the GDPR
- e. We will assist you in ensuring compliance with your obligations pursuant to Articles 32 to 36 of the GDPR

- f. At the end of the contract we will delete all the personal data we have been processing for you/we will return to you all the personal data we have been processing for you , save insofar as we are required by law to retain any of the personal data
- g. On request, we will make available to you all information necessary to demonstrate compliance with the obligations laid down in Article 28 of the GDPR
- h. We will allow you (and/or an auditor appointed by you) to carry out audits and inspections in respect of compliance with the obligations laid down in Article 28 of the GDPR, and will contribute to such audits and inspections
- i. We will inform you immediately if we consider we have been given an instruction which infringes the GDPR and/or other EU and/or Member State data protection provisions.

## Your obligations as data controller

As data controller you are responsible for complying with the General Data Protection Regulations as regards the provision of information to employees (data subjects) about what data is processed and also how this data is stored. As part of this, it is essential that you use our new starter employee form and that this is completed electronically using Excel. A copy of the form should then be printed and handed to the member of staff for signing. A copy of the signed form should be retained by you as evidence of compliance.

Set out the data controller's obligations, e.g. to provide specified information about the processing to relevant data subjects, so that the data processor does not need to do so.

## Our responsibilities under GDPR

Nothing within this contract relieves us of our own direct responsibilities under the GDPR.

## Security of data

Please refer to our Data Protection and Security policy available from our website.