

Privacy & Cookie Policy

For the purposes of the Data Protection Act 2018, Data (Use and Access) Act 2025 and the UK GDPR referred to herein as Data Protection Law ("DPL"), we are the 'Data Controller' (i.e. the company who is responsible for, and controls the processing of, your personal data).

Aaron Sweeney trading as Morgan Voss and Morgan Voss Associates ('we', 'us' or 'our') provide a comprehensive suite of professional services including accounting, bookkeeping, financial consulting, HR management, legal document preparation and proofing, payroll administration, Self-Assessment and tax return support, and full Making Tax Digital (MTD) compliance services, whose registered address is; No. 1, 71-73 Seaford Road, Salford, Greater Manchester, M6 6AQ. We act as a Data Controller for the personal information we collect and process in the course of providing our services. Our activities are registered with the Information Commissioner's Office (ICO) under Data Controller Registration Number ZC043655.

We take the privacy of our customers very seriously. We ask that you read this Privacy Policy ('the **Policy')** carefully as it contains important information about how we will use your personal data.

This Policy was last updated November 2025 as a result of the changes in our firm, and to provide more information, and to exceed the lawful requirements set out by DPL.

Contact details

Post: No. 1, 71-73 Seaford Road, Salford, Greater Manchester, M6 6AQ

Telephone: 0161 399 4719

Email: compliance@morganvoss.com



What information we collect, use, and why

We collect or use the following information to provide and improve products and services for clients:

- · Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences
- Technical data, including information about browser and operating systems

We collect or use the following personal information for the prevention, detection, investigation or prosecution of crimes:

- Names and contact information
- Client accounts and records
- Call recordings
- Financial information e.g. for fraud prevention or detection



We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Identification documents
- Client account information
- · Health and safety information
- Any other personal information required to comply with legal obligations

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Addresses
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Witness statements and contact details
- Photographs
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence



Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- Your right to erasure You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- 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. Read more about the right to data
 portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this policy.



Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and** services for clients are:

- Consent we have permission from you after we gave you all the relevant information. All of
 your data protection rights may apply, except the right to object. To be clear, you do have the
 right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Legitimate Interest - Providing and Improving Products and Services Our Legitimate Interests

We rely on Legitimate Interests (Article 6(1)(f) UK GDPR) to collect and use personal information where it is necessary to:

Provide our professional services (accounting, bookkeeping, payroll, HR support, financial consulting, legal document preparation, tax\self-assessment, MTD compliance and wider regulatory compliance services). Manage client relationships and deliver accurate, efficient and compliant outcomes. Improve our services, systems and internal processes. Protect our business, clients and the public from fraud, errors or misuse. These activities are fundamental to how we operate and are expected by clients who choose to use our services.

Why the processing Is necessary

We only process personal information that is required to: Deliver the services requested (e.g., preparing accounts, running payroll, completing tax returns, producing HR / legal documents, providing regulatory advice). Comply with legal and professional obligations, including HMRC requirements, employment law, accounting standards, regulatory compliance and audit duties. Maintain accurate records, provide support, and improve the reliability and quality of the services we offer. Without this information we would not be able to provide correct, lawful or fit-for-purpose services.

Benefits of the processing for clients

Accurate accounts, payroll, tax returns and legal / HR documents. Reduced administrative burden and lower compliance risk. Improved efficiency, reliability and tailored advice. Support in meeting statutory duties (e.g., HMRC, MTD, employment law). For the public and third parties Better regulatory compliance, accurate reporting and reduced financial or legal risk.



Benefits of the Processing for Business

Ability to operate effectively, fulfil obligations and improve services. These benefits cannot be achieved without processing relevant personal information.

Balancing Test – Protecting Individuals' Rights We take steps to ensure that our interests do not override individuals' rights by: Collecting only what is necessary and using it only for appropriate purposes. Being transparent about how we use personal data.

Applying strong security and confidentiality measures. Respecting all data-subject rights, including the right to object. Ensuring that processing is proportionate and not intrusive. We do not sell personal information or use it in ways that individuals would not reasonably expect.

Conclusion

Our use of personal data is legitimate, necessary and proportionate. It enables us to provide high-quality, compliant professional services and supports clients in meeting their legal and business obligations, while ensuring that individuals' rights and privacy are fully respected.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Legitimate interests we're collecting or using your information because it benefits you, our
 organisation or someone else, without causing an undue risk of harm to anyone. All of your
 data protection rights may apply, except the right to portability. Our legitimate interests are:
- Legitimate Interest Operation of Client or Customer Accounts Our Legitimate Interest We rely on Legitimate Interests (Article 6(1)(f) UK GDPR) to collect and use personal information where it is necessary to:



Set up, manage and maintain client or customer accounts

Verify identity and contact information, communicate with clients about their account, services, payments, and ongoing work. Maintain accurate records of services provided Manage billing, invoicing and payment processing, provide customer support and resolve queries, ensure security, prevent misuse, and detect errors or fraudulent activity. These activities are essential to the proper functioning of our business and to the services clients expect from us.

Why the Processing Is Necessary

We must process certain personal information (such as names, contact details, service history, payment information, and documents relevant to the client's account) so that we can:

Create and administer their account, deliver the services they have asked us to provide, keep records of the work we are completing, manage ongoing relationships and communications, ensure accounts are secure and accessible only by authorised individuals.

Without processing this information, we would not be able to provide or manage client accounts effectively, securely, or lawfully.

Benefits of the Processing For clients

Allows efficient onboarding and account setup, ensures accurate, up-to-date information for services, billing and communication, provides secure access to their records and service history, enables timely updates, reminders and support, helps prevent errors, fraud and unauthorised access.

Benefits of the processing for the business

Enables us to operate a functioning service delivery model supports accurate record-keeping and audit readiness, allows us to respond promptly to client enquiries, provides the data needed to maintain service quality and operational stability for third parties and the wider system, supports accurate and lawful financial and compliance-related reporting, reduces administrative disputes and errors affecting employees, HMRC or other authorities.



Balancing Test – Fairness and Proportionality

We have considered whether this processing impacts individuals' rights and freedoms and have implemented safeguards to ensure: only information necessary for account creation and operation is collected, information is not used for unrelated or unexpected purposes, strong confidentiality and technical security measures protect all data, individuals can exercise all applicable rights (access, rectification, objection, restriction, deletion where appropriate), processing is reasonable, proportionate and aligned with client expectations, we do not sell personal information or use it for intrusive profiling. Given these protections, the risk of harm or intrusion is low and does not outweigh the clear need to manage client accounts effectively.

Conclusion

Processing personal information to operate client or customer accounts is legitimate, necessary and proportionate. The processing enables us to deliver and manage services securely and efficiently, benefits clients directly, supports compliance and operational integrity, and respects individual rights without placing our interests unfairly above theirs.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the prevention, detection, investigation or prosecution of crimes are:

Legal obligation – we have to collect or use your information so we can comply with the law. All
of your data protection rights may apply, except the right to erasure, the right to object and the
right to data portability.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

Consent - we have permission from you after we gave you all the relevant information. All of
your data protection rights may apply, except the right to object. To be clear, you do have the
right to withdraw your consent at any time.



Our lawful bases for collecting or using personal information to comply with legal requirements:

Legal obligation – we have to collect or use your information so we can comply with the law. All
of your data protection rights may apply, except the right to erasure, the right to object and the
right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries**, **complaints or claims** are:

Legal obligation – we have to collect or use your information so we can comply with the law. All
of your data protection rights may apply, except the right to erasure, the right to object and the
right to data portability.

Where we get personal information from:

- Directly from you
- Legal bodies or professionals (such as courts or solicitors)
- Market research organisations
- Providers of marketing lists and other personal information
- Suppliers and service providers

Use of cookies

We use cookies when you visit our site. Cookies can be temporary or permanent. Temporary cookies are deleted as soon as you close your browser or mobile application - these are known as session cookies. Others, known as persistent cookies, are stored more permanently on your computer or device either until you delete them, or they expire.

By using our site, you agree to us placing these sorts of cookies on your device and accessing them when you visit the site in the future. If you want to delete any cookies that are already on your computer, the "help" section in your browser should provide instructions on how to delete specific cookies and change your cookie settings. Further information about cookies can be found at http://www.allaboutcookies.org. Please note that by deleting or disabling future cookies, your website experience may be affected, and you might not be able to take advantage of certain functions of our site.



Cookie, Description and Duration

Cookie	Description	Duration	Туре
elementor	This cookie is used by the website's WordPress theme. It allows the website owner to implement or	Session	Necessary
	change the website's content in real-time.		
wpEmojiSettingsSupports	WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display	Session	Necessary
	emojis properly.		

How long we keep information

We'll hold on to your information for as long as is needed to be able to provide our services to you, and for at least as long as we are providing services to you. Your personal information will also be held for as long as is necessary or required for legal and tax purposes, and to comply with legal or regulatory requirements, resolve disputes, prevent fraud, dishonesty and abuse, or to handle complaints. For these reasons we'll keep your information for accurate records and evidence that may be required to help resolve the problem, provide risk-related reporting and quality of service analysis.

We may even keep your information for a reasonable period of time after we have stopped providing our services to you, or your relationship with us has ended. However, we do periodically review data that we hold to decide whether it is still necessary to keep your information, if your business arrangement with us is no longer in place, has been cancelled, has expired or your information is no longer needed for us to provide the services to you.

In the absence of specific legal, regulatory, or contractual requirements but it's necessary to keep your information for administrative, management forecasting and planning and statistical purposes, we will limit what we keep where possible to minimise risk and safeguard personal information.



Who we share information with

Others we share personal information with

- Debt collection agencies
- Other financial or fraud investigation authorities
- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Professional consultants

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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11/2025 Version 1.0