

Privacy Policy

UPDATED: 3rd October 2019

POLICY STATEMENT INTRODUCTION

Crumb Umbrella Limited is a Payroll/Umbrella company specialising in supporting Freelancers, Consultants, Contractors and SME businesses in the UK.

This sections below give an overview of our commitment to you and how we fulfil our responsibilities under the relevant legislation including the UK's Data Protection Act (DPA) and the EU's new General Data Protection Regulation (GDPR).

Please [click here to download a PDF](#) version of our policy statement. If you have any questions about our policies or about your personal data please email Jacqui Till at jacqui@crumb.ltd, who is our Data Protection Officer

HOW WE USE PERSONAL DATA

Our overriding principle is that we treat all personal data as confidential.

We comply with all relevant legislation including the DPA & GDPR. Our Data Protection Officer is responsible for implementing policies to ensure legal compliance and to ensure that we maintain the high standards of confidentiality, privacy & security necessary to maintain the trust of our customers and all others with whom we work.

We are registered with the Information Commissioner's Office (ICO). No. ZA676482. The great majority of personal data we gather is required to fulfil our services. For staff, customers and potential customers, we gather the data relevant to processing their financial information and managing accounts such as, but not limited to, name, address, email, phone numbers and relevant reference numbers. This data is provided by our customers, suppliers and other affiliates related to providing the services. This data is stored within relevant 3rd party software package as well as our internal Management system.

Reflecting the diverse nature of our customer base and the other contacts with whom we work, we hold 'company contact' information relating to the legal/billing entity with whom we trade. We also hold 'person contact' data relating to individuals within the organisation with whom we interact. (NB where we trade with a private individual, the company contact data may be the same as for the person contact.)

We typically obtain data directly from our customers and contacts by phone, email or in person. We also obtain data from websites, enquiries, responses to marketing campaigns and publicly available sources. Third parties provide personal data such as where we are engaged by an agent on behalf of their client; in this case we check that consent has been provided by the subject to share the data.

Personal data and consent information is held primarily on our management system and in-house server. It is also held within our GDPR-compliant Microsoft Office 365 account and subject to our policies & safeguards. Crumb, Umbrella and our third-party system providers offer very high levels of enterprise-grade system security. The providers are contractually required to manage all data in accordance with demanding confidentiality agreements.

USE OF PERSONAL DATA

We use personal data to provide our services effectively & efficiently. This includes sending correspondence and documents related to your finances, general queries, invoices & statements, usually by email and resolving any queries. We will contact the relevant person using the most appropriate means in the circumstances. We use the data for processing payments, conducting credit checks where applicable & fulfilling our contractual obligations to clients and other service providers.

We use anonymised data for general analysis purposes. Any analysis containing any personal data is treated as confidential and subject to our privacy policies.

We do not provide personal data to any third parties except where necessary to fulfil orders. Any subcontractors with whom we may share personal data have contractual obligations to meet our safeguarding requirements. We may also share personal data with relevant authorities where required by law but only to the extent required.

Before sharing any personal data in the instances above, we will ensure that the other party is compliant with the regulations and our policies. Personal data is provided only where it is needed and on the basis that no consent is given to hold the data beyond the transaction in question or to use it for any other purpose.

Where the required consent has been given, Crumb Umbrella Limited may use your data for basic sales or marketing. We do not share any personal data with any third parties for marketing except outsourced marketing on our behalf and subject to our controls.

YOUR CONSENT

We will not hold any personal data on you without your consent. If you withdraw your consent to hold a particular item of personal data, it will be amended or deleted as requested. If you request to remove all personal data, all records will be deleted at the next routine cleansing.

We hope that you will consent to allow us to use your data occasionally for selected marketing purposes if information that is relevant to you. If so, we will ask you to specify the communication means you consent to receive. (As mentioned, any such communication will come only from us.)

If you are unwilling to receive any marketing information from us at all, you may still allow us to hold the data purely for transactional purposes. In this case, we will communicate with you only in relation to orders or enquiries you place and related accounting matters.

YOUR RIGHTS

At any time you have the right to receive a copy of all personal information that Crumb Umbrella holds about you. This can be requested in writing or by sending us an email. We may charge an administration fee of £10 to cover our costs in providing this information.

AMENDING & UPDATING YOUR PERSONAL DATA

We are obliged to keep personal data accurate and current. We wish to do this to ensure that any correspondence is effective and to help us provide our services efficiently.

Please notify us of any change to your personal data or consent to either your 'person contact' information or any related 'company contact' data that you are authorised to amend.

To amend any data or consent, please send an email to jacqui@crumb.ltd specifying the change required. This enables us to confirm your identity.

If you do not have access to email, please write to us at Customer Service Team, Crumb Umbrella, 1st Floor, Packwood House, Guild Street, Stratford-Upon-Avon, CV37 6RP or call 0203 941 2740. We will then contact you to verify your identity before making any change.

DATA PROTECTION STATUS AND EU LAW

In relation to our provision and administration of the Services, we are the data controller under the United Kingdom's Data Protection Act 1998. In other circumstances we may be a data processor. We respect your right to privacy and will only process Personal Information you provide to us in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other applicable privacy laws.

CONTACT US

If you have any questions at all in relation to this privacy policy, please do not hesitate in contacting Jacqui Till (jacqui@crumb.ltd).