

# WELLDEN TURNBULL LIMITED

## Privacy Notice

*Last updated: 28/4/2026*

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### About this notice

Wellden Turnbull Limited (“WTL”, “we”, “us”, “our”) is a firm of chartered accountants and chartered tax advisers. We are committed to protecting the privacy of the personal data we hold and to processing it in accordance with the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA 2018”).

This notice explains what personal data we collect, how we use it, who we share it with, how long we keep it, what rights you have, how we keep it secure, and how to contact us. It applies to clients, prospective clients, contacts, employees of corporate clients, beneficial owners, trustees, beneficiaries, and any other individuals whose personal data we process in the course of providing our services.

We are registered with the Information Commissioner's Office (“ICO”) under registration number ZA495610.

### Who is the controller of your personal data?

Wellden Turnbull Limited (company number 11480616), whose registered office is at Albany House, Claremont Lane, Esher, Surrey KT10 9FQ, is the controller of your personal data for the purposes of the UK GDPR.

Our subsidiaries Wellco Secretaries Limited and Wellco Trustee Limited may also act as controllers in relation to specific services (company secretarial and trusteeship appointments respectively). Where they do, the same processing standards set out in this notice apply.

In some engagements we act as a data processor rather than a controller. This is most commonly the case when we provide payroll services to a corporate client: in those engagements the corporate client is the controller of its employees' personal data and we process that data on its documented instructions under the terms of our engagement contract and applicable data processing terms.

We have not appointed a statutory Data Protection Officer, as we are not required to do so. The person with day-to-day responsibility for data protection matters is Mark Nelligan, who can be contacted at [dataprotection@wtca.co.uk](mailto:dataprotection@wtca.co.uk) or by telephone on +44 (0) 1932 868444.

## What personal data we collect

The categories of personal data we collect depend on the services we provide to you. They may include:

- Identification and contact details: name, date of birth, address, email address, telephone number, nationality, and photographic ID (e.g. passport, driving licence);
- Unique identifiers, including (where applicable) National Insurance number, Unique Taxpayer Reference (UTR), VAT registration number, and Companies House personal code;
- Financial information: income, expenditure, assets, liabilities, tax records, bank account and payment details, and related documentation;
- Employment and business information: role, employer, business interests, shareholdings, directorships, and trusteeships;
- Family and personal circumstances: marital status, dependants, and beneficiaries (particularly where relevant to tax planning, probate, or trust matters);
- Information required for anti-money laundering (AML) and sanctions screening, including checks undertaken through electronic verification providers;
- Correspondence and communications between us; and
- Any other personal data you provide to us, or which we obtain from third parties, in connection with the services we provide.

You are not under a legal obligation to provide personal data to us, but if you choose not to provide information that we reasonably need to deliver our services or to meet our legal and regulatory obligations (for example, anti-money laundering identification), we may be unable to act for you, or to provide all of the services you have requested.

## Special category data

In some cases, we may process "special category" data under Article 9 UK GDPR — for example, health information relevant to a tax claim, or information revealing religious beliefs in the context of charity or trust work. We only process such data where we have a lawful basis under Article 9, typically: your explicit consent (Article 9(2)(a)); that processing is necessary for the establishment, exercise, or defence of legal claims (Article 9(2)(f)); or reasons of substantial public interest under DPA 2018, Schedule 1, Part 2 (for example, the prevention or detection of unlawful acts).

## Criminal offence data

Where relevant, we may process data relating to criminal convictions and offences under Article 10 UK GDPR — principally in connection with our obligations under the Proceeds of

Crime Act 2002 and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. We do so in reliance on the conditions in DPA 2018, Schedule 1, Part 2, paragraphs 10 and 14 (preventing or detecting unlawful acts; preventing fraud).

## How we collect your personal data

We collect personal data from a range of sources, including:

- Directly from you, including information you provide when engaging our services, corresponding with us, or completing client onboarding forms;
- From your employer or a corporate entity with which you are connected, where we are engaged by that entity;
- From third parties acting on your behalf, such as solicitors, financial advisers, and other professional advisers;
- From HMRC, Companies House, the Charity Commission, the Land Registry, and other regulatory or public bodies;
- From electronic identity verification and AML screening services; and
- From publicly available sources, including the internet, social media, and credit reference agencies.

**Important:** If you provide us with personal data about another individual (for example, a spouse, dependant, employee, director, or beneficial owner), you must ensure that you have a lawful basis for sharing their information with us, or that the individual has consented. Where appropriate, please draw this notice to their attention.

## Why we process your personal data and our lawful bases

We only process personal data where we have a lawful basis under Article 6 UK GDPR. The table below sets out the principal purposes for which we process personal data and the lawful basis we rely on for each.

### Delivering our professional services

We process personal data to provide the accountancy, tax, audit, probate support, trust, payroll, company secretarial, and related services that you or your organisation engage us to provide. Our lawful basis is Article 6(1)(b) (performance of a contract to which you are a part, or taking steps at your request prior to entering a contract) or, where the engagement is with your employer or a corporate entity, Article 6(1)(f) (legitimate interests in delivering the contracted services).

### Complying with our legal and regulatory obligations

We process personal data to comply with our obligations under anti-money laundering legislation, the Proceeds of Crime Act 2002, the Companies Act 2006, HMRC rules, the Trust Registration Service, the ICAEW Code of Ethics and practice assurance requirements, and applicable auditing and assurance standards. Our lawful basis is Article 6(1)(c) (compliance with a legal obligation).

### Practice management and administration

We process personal data to manage our relationship with you, maintain our records, send fee notes and related correspondence, manage conflicts of interest, defend ourselves against claims, and administer our business generally. Our lawful basis is Article 6(1)(f) (legitimate interests in operating the firm efficiently and professionally).

## Marketing and client communications

We may send you updates on legal and regulatory developments, briefings, and invitations to events. Our lawful basis is Article 6(1)(f) (legitimate interests in keeping clients and contacts informed), or your consent (Article 6(1)(a)) where required by the Privacy and Electronic Communications Regulations 2003. You may opt out at any time by contacting us.

## Recruitment

Where you apply for a role with us, we process your personal data in reliance on Article 6(1)(b) (taking steps at your request prior to entering a contract) and Article 6(1)(f) (legitimate interests in assessing candidates).

## Use of AI-assisted tools in delivering our services

In common with many professional firms, we use AI-assisted productivity tools to help us deliver our services more efficiently. This section explains how and why we do so, and the safeguards we apply.

### Which tools we use

We currently use paid enterprise-tier versions of large language model services provided by Anthropic (Claude) and Google (Gemini). We may use additional AI tools from time to time and will update this notice accordingly.

### Purposes

We use these tools to assist with tasks such as drafting correspondence, summarising documents, researching legal and tax points, and reviewing written deliverables. AI output is always subject to meaningful human review by a qualified member of our team before it is relied on or communicated externally. No automated decision-making within the meaning of Article 22 UK GDPR is undertaken.

### Lawful basis

Our lawful basis is Article 6(1)(b) (performance of our engagement contract) and Article 6(1)(f) (legitimate interests in delivering our services efficiently and to a high professional standard).

### Safeguards

The vendors we use act as data processors under Article 28 UK GDPR. We have entered into written data processing agreements with each of them which include, among other things, contractual commitments that our data will not be used to train their models, appropriate security measures, and international transfer safeguards. We operate an internal acceptable use policy which restricts the categories of data that may be input into these tools and requires heightened controls for any processing of special category or criminal offence data.

## Who we share your personal data with

We treat your personal data as confidential and only share it with the following categories of recipient where necessary for the purposes described in this notice:

- Our staff, subcontractors, and outsourced service providers engaged in delivering our services;

- Cloud software and infrastructure providers (for example, Microsoft, Google, and specialist accounting and practice management software vendors);
- AI-assisted productivity tool vendors (currently Anthropic and Google) as described in the section above;
- Electronic identity verification and AML screening providers;
- HMRC, Companies House, the Charity Commission, the Pensions Regulator, the Financial Conduct Authority, the Information Commissioner's Office, and other regulatory and tax authorities as required;
- The Institute of Chartered Accountants in England and Wales ("ICAEW") and other professional bodies in connection with practice assurance, quality reviews, regulatory inspection, and complaints;
- Our professional indemnity insurers, brokers, and legal advisers, including where we need to notify a circumstance, claim, or potential claim;
- Other professional advisers you have engaged (such as solicitors, financial advisers, and bankers) where you have authorised us to correspond with them or where doing so is necessary to deliver the engagement;
- Law enforcement, courts, tribunals, and other third parties where disclosure is required by law, court order, or in connection with actual or threatened legal proceedings; and
- Any party to whom we may transfer our business or a part of it, and their professional advisers, in connection with a proposed or actual sale, merger, reorganisation, or similar transaction.

Where third parties act as our processors, they do so under written contracts that require them to protect your personal data and process it only on our documented instructions.

## International transfers

Some of the recipients listed above are based outside the United Kingdom. In particular, some of our cloud and AI software providers process data in the United States and other jurisdictions.

Where we transfer personal data outside the UK, we ensure that appropriate safeguards are in place as required by Chapter V UK GDPR. These may include:

- Transfers to countries covered by a UK adequacy regulation;
- Transfers to recipients certified under the UK Extension to the EU-US Data Privacy Framework (where the recipient is in the United States);
- The International Data Transfer Agreement ("IDTA") or the UK Addendum to the European Commission's Standard Contractual Clauses; and
- Where required, a transfer risk assessment to confirm that the transferred data will receive a level of protection essentially equivalent to that under UK law.

You may obtain a copy of the transfer safeguards applying to any specific transfer by contacting us using the details at the end of this notice.

## How long we keep your personal data

We retain personal data for as long as we need it for the purposes for which it was collected and to comply with our legal, regulatory, and professional obligations. The principal retention periods are:

- Client engagement files (including tax returns, audit files, accounts, and correspondence): **seven years** from the end of the engagement or the relevant

accounting/tax period, in line with HMRC requirements and ICAEW professional guidance;

- Audit working papers: **seven years** from the date of the auditor's report, in line with FRC and ICAEW requirements;
- AML records (identification evidence and ongoing monitoring): **five years** from the end of the business relationship, as required by the Money Laundering Regulations 2017;
- Probate and estate administration records: up to **twelve years** from the conclusion of the administration;
- Employment records for unsuccessful job applicants: **six months** from the conclusion of the recruitment process;
- Marketing contact data: until you opt out or we identify that the record is no longer active.

We may retain data for longer where we are required to do so by law, where we need it to defend ourselves against a claim, or where an extended limitation period applies. After the applicable retention period, we securely delete or anonymise the data.

## Your rights

Subject to certain exemptions, you have the following rights in respect of your personal data:

- **Right to be informed** (Articles 13 and 14): to be told how your personal data is collected and used (this notice is intended to fulfil that right);
- **Right of access** (Article 15): to ask for a copy of the personal data we hold about you;
- **Right to rectification** (Article 16): to ask us to correct inaccurate or incomplete data;
- **Right to erasure** (Article 17): to ask us to delete your data in certain circumstances (this right may be limited by our legal, regulatory, and professional retention obligations);
- **Right to restriction** (Article 18): to ask us to restrict processing in certain circumstances;
- **Right to data portability** (Article 20): where processing is based on consent or contract and is carried out by automated means, to receive your data in a structured, commonly used, and machine-readable format;
- **Right to object** (Article 21): to object to processing based on our legitimate interests, and an absolute right to object to direct marketing;
- **Right to withdraw consent** (Article 7(3)): where we rely on your consent, you may withdraw it at any time (withdrawal does not affect the lawfulness of processing before withdrawal);
- **Rights in relation to automated decision-making** (Article 22): we do not undertake automated decision-making that produces legal or similarly significant effects;
- **Right to complain to the ICO**: you may complain to the Information Commissioner's Office at any time (contact details at the end of this notice).

To exercise any of these rights, please contact us using the details at the end of this notice. We will respond within one month (which may be extended by up to two further months for complex requests, in which case we will let you know). We may ask you to verify your identity before responding to a request, for example by providing a copy of your passport or driving licence and proof of your current address.

## How we keep your personal data secure

We maintain appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These include access controls, encryption in transit and at rest (where appropriate), staff training, confidentiality obligations, vendor due diligence, and incident response procedures. We review our security measures regularly.

## Cookies and our website

Our website [www.wtca.co.uk](http://www.wtca.co.uk) uses cookies and similar technologies. Please see our separate Cookie Notice [\[insert link\]](#) for details of the cookies we use and how you can control them.

## Children's data

Our services are not directed at children, and we do not knowingly collect personal data directly from children through our website. We may, however, process personal data relating to children where it is provided to us by their parents, guardians, trustees, or other responsible adults in the context of the services we provide (for example, in connection with family tax planning, trusts, or estate administration). Where we do so, we apply the same protections as for any other personal data we hold.

## Links to other websites

Our website may contain links to other websites operated by third parties (for example, professional bodies, regulators, or external service providers). This notice applies only to personal data processed by us. We are not responsible for the privacy practices of third-party websites, and we encourage you to read the privacy notices of any other websites you visit.

## Changes to this notice

We may update this notice from time to time to reflect changes in our services, technology, or legal and regulatory requirements. The current version will always be available on our website and the date of the latest update is shown at the top of this notice. Where changes are material, we will draw them to your attention.

## Contact us

If you have any questions about this notice, wish to exercise your rights, or wish to make a complaint about how we handle your personal data, please contact:

### **Wellden Turnbull Limited**

Albany House, Claremont Lane

Esher, Surrey KT10 9FQ

Email: [dataprotection@wtca.co.uk](mailto:dataprotection@wtca.co.uk)

Telephone: **+44 (0) 1932 868444**

If you are not satisfied with our response, or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office:

### **Information Commissioner's Office**

Wycliffe House, Water Lane

Wilmslow, Cheshire SK9 5AF

Telephone: **0303 123 1113**

Website: **[www.ico.org.uk](http://www.ico.org.uk)**

— *End of Privacy Notice* —