affinia

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Privacy Policy

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PRIVACY POLICY

(Comprehensive version)
Last reviewed: 17 August 2026

Affinia Limited and its Groups ("Affinia", the "Firm", "we", "us", "our") are committed to protecting the privacy of visitors ("you") to our site. This Privacy Policy sets out how Affinia uses and protects any information that you give us when you use our site or contact us.

Affinia Groups

Affinia is a group of UK-based accountancy and advisory firms. Some Group entities collect and process personal data while others do not. Please refer to the Legal and Regulatory webpage.

Introduction

Affinia is committed to ensuring that your privacy is protected. This Policy describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy statement.

Under the UK General Data Protection Regulations (GDPR) and the Privacy and Electronic Communications Regulations (PECR), we are required to update the data protection references in our engagement letters with clients and, in the case of individual clients, provide certain details regarding the Firm and collection and use of your personal data. This is set out in more detail below where we tell you:

- why we are able to process your information.
- what purpose we are processing it for.
- whether you have to provide it to us.
- how long we store it for.
- whether there are other recipients of your personal information.
- whether we intend to transfer it to another country.
- whether we do automate decision-making or profiling.

By continuing to use the site and by providing any personal data (including sensitive personal data) to us via the site or email addresses provided on the site, you are consenting to our use of your personal data as set out in this Privacy Policy. please do not send us any personal data if you do not want that information to be used by us in this manner.

Visitors are not required to register to gain access to this site. Personally identifiable information provided to Affinia through this site is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on how to do so.

Our site and services are not intended for individuals under the age of 13, and we do not knowingly collect personal data from children.

Data Protection Officer

If you have any questions about this Policy, including any requests to exercise your legal rights, please contact DPO@affinia.co.uk.

Collection of personal data

Typically, user data is collected in order to assist visitors to:

- register for certain areas of the site
- submit resumes or work history information
- contact us for further information
- enter quick client surveys

We collect personally identifiable information that is voluntarily provided by visitors to this site. The data that Affinia receives from site visitors may include personal identifiers (e.g., first and last name, date of birth, company name, incorporation number, VAT number), contact information (e.g., email address, telephone number, billing or correspondence address).

We need to know basic personal data in order to provide you with our services, and to claim our right to be paid in return for our services, under our standard terms of business we have with you. If you do not provide this information, then we will be unable to provide the services you have requested. We will not collect any personal data from you that we do not need to provide and oversee the services we have agreed with you.

Other information that we may request to collect at a later point if you engage in our services may include account and payment information (e.g., banking details, NI number). Documentation that confirms your identity, qualifications, employment or residential address may also be collected for onboarding/due diligence check purposes. Again, the information we process about you includes information: you have directly provided to us; that we gather from third parties or service providers; as a result of monitoring how you use our site or our services.

Lawful basis for processing personal data

It is our Policy to limit the information collected to only the minimum information required to complete a site visitor's request or to fulfil the agreed scope of work described in the letter of engagement. We have processes in place to make sure that only the people in our Firm who need to access your data can do so.

We process your information to provide, and administer our services, communicate with you, to arrange payment for our services, for security and fraud prevention, and to comply with law.

When we process on the lawful basis of legitimate interest, we apply the following tests to determine whether it is appropriate:

- **The purpose test**— is there a legitimate interest behind the processing?
- **Necessity test**— is the processing necessary for that purpose?
- **Balancing test**— is the legitimate interest overridden by the individual's interests, rights or freedoms?

Affinia's intention is not to seek any sensitive information through our site unless legally required for recruiting purposes. Sensitive information includes race or ethnic origin, political opinions, religious

or philosophical beliefs, trade union membership, genetic or biometric data used for identification, physical or mental health, and sex life or sexual orientation. Criminal offence data is treated with equivalent protections but is subject to separate conditions under UK data protection law.

All the personal data we hold about you will be processed by our staff in the United Kingdom and no third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. We have set out below the legal bases for the Firm to process your data. Some of our processing is necessary for compliance with a legal obligation. For example, the Firm is a regulated entity and therefore has a duty to act as a data controller and is obliged to report certain matters to its regulators or law enforcement agencies.
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We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with providing you with services.

We will also communicate with you information about other services we can offer you and update you about our activities.

Where your information is used other than in accordance with one of these uses, we will first obtain your consent to that use.

We take all reasonable steps to ensure that your personal data is processed securely.

Use of personal data

User data obtained by the site is used for internal business purposes of Affinia and in connection with a visitor's request. This data is not shared with others for unrelated purposes unless stated otherwise.

We will use your personal data that you have provided to fulfil your request through the appropriate correspondence channel and/or use your personal data to conduct due diligence or KYC screening (where relevant).

Affinia makes every practical effort to avoid excessive or irrelevant collection of data.

Except for instances where visitors explicitly choose to receive specific Affinia marketing or other informational materials, Affinia Limited will not use personal data collected from our website to distribute marketing or informational materials.

Sharing your personal data

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent.

Third parties

It is Affinia's policy only to disclose User Data to third parties under the following circumstances:

- when explicitly requested by the visitor
- when required to facilitate conferences or events hosted by a third party
- when required to meet any other request of a visitor.

Categories of third parties that Affinia may share personal data with include government and regulatory bodies (such as HMRC, the ICO, or law enforcement, where we have a legal obligation to do so), and other members of the Affinia Group.

There are several places throughout this site that may link to other websites that do not operate under Affinia Limited Privacy practices. When visitors link to other websites, Affinia Privacy practices no longer apply. We encourage you to review each site's Privacy Policy before disclosing any personally identifiable information.

International data transfers

While Affinia primarily stores and processes personal data within the United Kingdom, we may use third-party service providers (such as cloud storage, email platforms, or analytics tools) that process data outside the UK.

Where such transfers occur, we ensure that appropriate safeguards are in place, including adequacy regulations or standard contractual clauses approved by the UK Information Commissioner's Office (ICO), to ensure your data remains protected.

Storage of personal data

Affinia is a UK-domiciled Firm whose primary offices are in the UK. Hence all data is stored on UK data that are comply with industry security standards.

Retention periods vary depending on the type of data and the legal or professional obligation that applies (for example, HMRC, Companies Act, or anti-money laundering requirements). Typical retention periods range from 5 to 6 years from the end of the relevant relationship or engagement, after which data is securely destroyed unless a longer period is required or permitted by law. Full details of our retention periods by record type are set out in our internal Data Retention Schedule, available on request from the Data Protection Officer.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

Security measures

We have what we believe are appropriate security controls in place to protect personal data. We use a range of measures to ensure that we keep your personal data secure, accurate and up to date.

These include:

- education and training to relevant staff to ensure they are aware of our data protection obligations when processing personal data.
- administrative and technical controls to restrict access to personal data to a 'need to know' basis.
- technological security measures, including fire walls, encryption and anti-virus software.
- physical security measures, such as staff security passes to access our premises.

We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information.

We accept no liability in respect of breaches that occur beyond our sphere of control.

Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights.

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (the 'right to be forgotten')
- The right to restrict processing
- The right to data portability
- The right to object
- The right to complain

If you wish to exercise any of these rights, please email DPO@affinia.co.uk or use the information in the 'Get in Touch' section on the site.

To process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

Marketing preferences

Under the Privacy and Electronic Communications Regulations (PECR), we may contact you with marketing messages—including newsletters, event updates, and service promotions—only if:

- You have provided your explicit consent; or
- You are an existing client and the content relates to similar services (soft opt-in).

You can withdraw your consent or change your marketing preferences at any time by contacting us at marketing@affinia.co.uk or using the unsubscribe links included in our messages.

We never share your information with third parties for their own marketing purposes.

Use of cookies

A cookie is an element of data that a website can send to a visitor's computer's browser so that this computer will be recognised by the site on their return. Cookies allow our web server to recognise a computer on connection to the Site, which in turn allows the server to make downloading of pages faster than on first viewing. In addition, cookies may also be used by us to establish statistics about the use of the site by Internet users by gathering and analysing data such as most visited pages, time spent by users on each page, site performance, etc. By collecting and using such data, we hope to improve the quality of the site.

The data collected by our servers and/or through cookies that may be placed on your computer will not be kept for longer than is necessary to fulfil the purposes mentioned above. In any event, such information may not be kept for longer than one year.

Navigation data about site viewers is automatically collected by our servers. If you do not wish to have this navigation data collected, we recommend that you do not use the site. A visitor can also set their browser to block the recording of cookies on their hard drive to minimise the amount of data that may be collected about your navigating on the site. The browser on a computer can be set to notify the user when a cookie is being recorded on their computer's hard drive. Most browsers can also be set to keep cookies from being recorded on their computer. However, for optimal use of the site, we recommend that visitors do not block the recording of cookies on their computer.

All Affinia servers and computer systems are protected from outside intrusions. As a result, all data that may be collected about site viewers through the use of cookies will be protected from unauthorised access.

Cookies used on the site are only active for the duration of the visit. Cookies used on this site are not stored on visitor's computer once you have closed your web browser. Information generated by the use of cookies may be compiled into an aggregate form so that no individual can be identified. We may at some stage use cookies to identify users when they visit the site to use personalised services. In such circumstances these cookies may be kept on the hard drive of their computer following closure of the web browser. Cookies used in connection with such services enable us to build up a profile of our users and to develop personalised versions of the site.

For more information about cookies, please see the Information Commissioner's website home page or the Interactive Advertising Bureau.

A visitor may choose to not receive a cookie file by enabling your web browser to refuse cookies. The procedure for refusal of cookies may vary for different software products. Please check with your internet browser software help or your software supplier if you wish to refuse cookies.

Contacting us

If you wish to exercise any of the rights relating to your information above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information you can contact us in the following ways:

a) Write to our Data Protection Officer at Suite E2, The Octagon, 2nd Floor Middleborough, Colchester, England, CO1 1TG

b) send an email to DPO@affinia.co.uk

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office who can be contacted in the following ways:

a) Write to the Information Commissioner at The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;

b) Via the Information Commissioners data protection complaints tool which can be found at https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/

Modifications

Affinia reserves the right to modify or amend this statement at any time. The effective date will be displayed at the beginning of this statement. To keep visitors informed, Affinia will notify users of material changes to our Privacy Policy by prominently identifying a link on our site home page to the updated Privacy Policy for a period of not less than two weeks.

Disclaimer: Any technical information included in the above is for general information and educational purposes only. Please contact a member of our team for specialist advice before taking any action. Affinia do not accept any responsibility for any errors or omissions contained within this content.

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Thank you.

www.affinia.co.uk