

Table of Contents

**Data**..... 2

- 1. Introduction ..... 2
- 2. The purposes for which we process personal data ..... 2
- 3. The legal bases for our intended processing of personal data ..... 2
- 4. Persons/Organisations to whom we may give personal data ..... 2
- 5. Transfers of personal data outside the UK ..... 3
- 6. Retention of Personal Data..... 3
- 7. Requesting personal data we hold about you (Subject Access Requests) ..... 3
- 8. Putting things right (the right to rectification)..... 4
- 9. Deleting your records (the right to erasure)..... 4
- 10. The right to restrict processing and the right to object..... 4
- 11. Obtaining and reusing personal data (the right to data portability) ..... 4
- 12. Changes to these terms ..... 4

**Website**..... 5

- 1. Who we are:..... 5
- 2. Cookies..... 5
- 3. Embedded content from other websites..... 5
- 4. Who we share your data with..... 5
- 5. How long we retain your data ..... 5
- 6. What rights you have over your data..... 5
- 7. Where we send your data..... 5

# Data

## 1. Introduction

The Data Protection Act 2018 (“DPA 2018”) and the UK General Data Protection Regulation (“UK GDPR”) impose certain legal obligations in connection with the processing of personal data. Infinity Financial Solutions Limited is a controller within the meaning of the UK GDPR. The firm’s contact details are as follows:

Infinity Financial Solutions Limited  
4 Newton Close  
Whiteparish  
Salisbury  
SP5 2SP  
ICO Reference: ZB416274

We may amend this privacy notice from time to time. If we do so, we will supply you with and/or otherwise make available to you a copy of the amended privacy notice.

Where we act as a processor on behalf of a controller (for example, when processing payroll), we provide an additional schedule setting out the required information. That additional schedule should be read in conjunction with this privacy notice.

## 2. The purposes for which we process personal data

We process personal data for the following purposes:

- to enable us to supply professional services to you as our client
- to fulfil our obligations under relevant laws in force from time to time (e.g. Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017)
- to comply with professional obligations to which we are subject as a member of the Association of Accounting Technicians
- to use in the investigation and/or defence of potential complaints, disciplinary proceedings and legal proceedings
- to enable us to invoice you for our services and investigate/address any attendant fee disputes that may have arisen
- to contact you about other services we provide which may be of interest to you if you have consented to us doing so

## 3. The legal bases for our intended processing of personal data

We rely on the following legal bases in order to process your personal data:

- occasionally we will rely on your consent to process your personal data but only if we have contacted you beforehand and asked you to agree;
- the processing is necessary for the performance of our contract with you so that we can deliver our services to you;
- the processing is necessary for compliance with legal obligations to which we are subject (e.g. MLR 2017)
- the processing is necessary for our legitimate interests, such as: investigating/defending legal claims, recovering debts owed to us, keeping our client records up to date and to develop our services and grow our business

If you do not provide the information that we request, we may not be able to provide professional services to you. If this is the case, we will not be able to commence acting or will need to cease to act.

## 4. Persons/Organisations to whom we may give personal data

We may share your personal data with:

- HMRC
- any third parties with whom you require or permit us to correspond or subcontractors
- an alternate appointed by us in the event of incapacity or death tax insurance providers
- professional indemnity insurers

- our professional bodies (The Association of Accounting Technicians) and/or the Office of Professional Body Anti-Money Laundering Supervisors (OPBAS) in relation to practice assurance and/or requirements under the MLR 2017 (or similar legislation)
- other professional consultants and service providers

If the law allows or requires us to do so, we may share your personal data with:

- the police and law enforcement agencies, courts and tribunals
- the Information Commissioner's Office (ICO)

We may need to share your personal data with the third parties identified above in order to comply with our legal obligations, including our legal obligations to you. If you ask us not to share your personal data with such third parties we may need to cease to act.

## 5. Transfers of personal data outside the UK

Your personal data will be processed in the UK and within the European Union only. All data is stored on UK-based servers.

## 6. Retention of Personal Data

When acting as a data controller and in accordance with recognised good practice within the tax and accountancy sector we will retain all of our records relating to you as follows:

- where tax returns have been prepared it is our policy to retain information for six years from the end of the tax year to which the information relates
- where ad hoc advisory work has been undertaken it is our policy to retain information for six years from the date the business relationship ceased
- where we have an ongoing client relationship, data which is needed for more than one year's tax compliance (e.g. capital gains base costs and claims and elections submitted to HMRC) is retained throughout the period of the relationship, but will be deleted four years after the end of the business relationship unless you as our client ask us to retain it for a longer period.

Our contractual terms provide for the destruction of documents after four years and therefore agreement to the contractual terms is taken as agreement to the retention of records for this period, and to their destruction thereafter.

You are responsible for retaining information that we send to you (including details of capital gains base costs and claims and elections submitted) and this will be supplied in the form agreed between us. Documents and records relevant to your tax affairs are required by law to be retained by you as follows:

Individuals, trustees and partnerships:

- with trading or rental income: 5 years and 10 months after the end of the tax year
- otherwise: 22 months after the end of the tax year

Companies, LLPs and other corporate entities:

- 6 years from the end of the accounting period

## 7. Requesting personal data we hold about you (Subject Access Requests)

You have a right to request access to your personal data that we hold. Such requests are known as 'subject access requests' ("SARs").

Please provide all SARs in writing.

To help us provide the information you want and deal with your request quickly, you should include enough details to enable us to verify your identity and locate the relevant information. For example, you should tell us:

- your date of birth
- previous or other name(s) you have used
- your previous addresses in the past 5 years

- personal reference number(s) that we may have given you, for example your national insurance number, your tax reference number or your VAT registration number
- what type of information you want to know

If you do not have a national insurance number, you must send a copy of the back page of your passport or a copy of your driving licence and a recent utility bill.

DPA 2018 requires that we comply with a SAR promptly and in any event within one month of receipt. There are, however, some circumstances in which the law allows us to refuse to provide access to personal data in response to a SAR (e.g. if you have previously made a similar request and there has been little or no change to the data since we complied with the original request).

You can ask someone else to request information on your behalf – for example, a friend, relative or solicitor. We must have your authority to respond to a SAR made on your behalf. You can provide such authority by signing a letter which states that you authorise the person concerned to write to us for information about you, and/or receive our reply.

Where you are a controller and we act for you as a processor (e.g. by processing payroll), we will assist you with SARs on the same basis as is set out above.

### 8. Putting things right (the right to rectification)

You have a right to obtain the rectification of any inaccurate personal data concerning you that we hold. You also have a right to have any incomplete personal data that we hold about you completed. Should you become aware that any personal data that we hold about you is inaccurate and/or incomplete, please inform us immediately so we can correct and/or complete it.

### 9. Deleting your records (the right to erasure)

In certain circumstances you have a right to have the personal data that we hold about you erased. Further information is available on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)). If you would like your personal data to be erased, please inform us immediately and we will consider your request. In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable, we will supply you with the reasons for refusing your request.

### 10. The right to restrict processing and the right to object

In certain circumstances you have the right to ‘block’ or suppress the processing of personal data or to object to the processing of that information. Further information is available on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)). Please inform us immediately if you want us to cease to process your information or you object to processing so that we can consider what action, if any, is appropriate.

### 11. Obtaining and reusing personal data (the right to data portability)

In certain circumstances you have the right to be provided with the personal data that we hold about you in a machine-readable format, e.g. so that the data can easily be provided to a new professional adviser. Further information is available on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)).

### 12. Changes to these terms

We reserve the right to change these standard terms of business from time to time with 30 days written notice. You agree to any changes in these terms. If you do not agree to these terms at any time then you agree to inform us and where necessary, terminate services as per the termination clause 23. The current and latest terms are available online at <https://infinity-fs.co.uk/privacy-policy/>.

Version 2, Issue date 1<sup>st</sup> March 2023.

## Website

### 1. Who we are:

Our website address is <https://infinity-fs.co.uk>

### 2. Cookies

If you leave a comment on our site you may opt in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. When you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

### 3. Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

### 4. Who we share your data with

If you request a password reset, your IP address will be included in the reset email.

### 5. How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

### 6. What rights you have over your data

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

### 7. Where we send your data

Visitor comments may be checked through an automated spam detection service.

Version 2, Issue date 1<sup>st</sup> March 2023.