

AVRION **Risk**

PRIVACY NOTICE

Version V1.0
March 2026

PRIVACY NOTICE

Who We Are

Avrion Risk Ltd is a company incorporated in the United Kingdom under company number 14111848, with its registered office at 128 Stoke Lane Westbury on Trym, Bristol, BS9 3RJ, United Kingdom and is registered with the Information Commissioner's Office in line with the Data Protection Act 2018

We provide corporate intelligence and risk mitigation services, including background screening, reputational research, compliance-related analysis and risk assessment support (the "Services").

For the purposes of the UK General Data Protection Regulation ("UK GDPR"), Avrion Risk Ltd is responsible for the personal data processed as described in this Privacy Notice.

What Personal Data We Process

We process the following categories of personal data, depending on your interaction with our Services:

Platform and Account Data

Where you register for or use our platform, we may process:

- Name and surname;
- Business email address;
- Business telephone number;
- Business address;
- Organisation details;
- VAT number (where applicable);
- Account credentials and authentication data;
- Payment details and payment transaction data;
- Technical data, including IP address and device-related information;

Corporate and Research Data

In the course of providing risk intelligence and screening services, we may process:

- Corporate identification and registration data;
- Corporate address data;
- Tax-related corporate data;
- Financial and commercial reference data;
- Professional affiliation information;
- Publicly available information relevant to compliance or reputational risk assessment

Where relevant and lawfully obtained, this may include information relating to regulatory status, sanctions listings, or criminal conviction data.

How We Obtain Personal Data

We aim to use reliable and reputable sources and apply reasonable steps to ensure information is processed responsibly:

- Directly from platform users and subscribing organisations;
- From reputable third-party information providers;
- From publicly available sources, including corporate registers, regulatory publications and official databases;

- From sanctions and politically exposed person (PEP) lists;
- Through technical interaction with our website and platform (such as IP address and usage data).

We do not obtain personal data through covert or unlawful means.

Why We Process Personal Data

We process personal data only where we have a valid legal basis to do so:

- Contractual necessity — to provide Services to subscribing organisations;
- Legal obligation — where required under applicable law;
- Legitimate interests — to provide risk intelligence and compliance support services, provided that such interests are not overridden by the rights and freedoms of data subjects;
- Consent — where specifically required (for example, certain marketing communications).

Where we rely on legitimate interests, we conduct appropriate balancing assessments.

Profiling and Automated Decision-Making

Our Services may include automated processing techniques designed to assist clients in identifying potential risk indicators. However:

- We do not make decisions that produce legal or similarly significant effects solely by automated means;
- All outputs are intended as decision-support tools;
- Clients remain responsible for conducting their own independent review and assessment.

How We Share Personal Data

We may share personal data with:

- Trusted service providers acting as processors on our behalf;
- Hosting and IT infrastructure providers located within the United Kingdom, European Union or European Economic Area (or other countries recognized as providing an adequate level of data protection);
- Regulatory authorities, courts or law enforcement where legally required;
- Professional advisers (such as auditors or legal counsel).

All processors are subject to contractual data protection obligations.

Cookies and Similar Technologies

We use cookies and similar technologies to operate and improve our website and platform. Some cookies are essential for the functioning of the service. Other cookies, such as analytics cookies, are used only with your consent. You can manage your cookie preferences through our cookie banner or settings tool at any time. For further details, please refer to our Cookie Policy found on the Website.

International Transfers

Where personal data is transferred outside the United Kingdom, European Union or European Economic Area (or other countries recognized as providing an adequate level of data protection), we ensure appropriate safeguards are in place, including contractual mechanisms recognised under UK GDPR.

Retention

We retain personal data only for as long as necessary to fulfil the purposes described in this Privacy Notice, including compliance with legal, regulatory, accounting or reporting obligations.

Retention periods are determined based on:

- The nature of the data;
- Legal and regulatory requirements;
- Contractual obligations;
- Legitimate business needs.

Your Data Protection Rights

Subject to applicable law, you may have the right to:

- Request access to your personal data;
- Request rectification of inaccurate data;
- Request erasure of personal data;
- Request restriction of processing;
- Object to processing based on legitimate interests;
- Request data portability;
- Withdraw consent where processing is based on consent.

Some rights may be limited where processing is required for compliance with legal obligations. Requests may be submitted using the contact details below.

Changes to Our Privacy Notice

We may update or amend this Privacy Notice from time to time to reflect changes in our practices, services, or applicable law. Any updated version will be posted on our website or platform, and the "last revised" date will be updated accordingly. You are encouraged to review this Privacy Notice periodically to stay informed of our practices. Your continued use of the Services after the revised Privacy Notice has been posted constitutes your acknowledgment, understanding, and agreement to be bound by the most current version of this Privacy Notice, to the extent permitted by law.

Contact the Data Protection Officer

If you have any questions about this Privacy Notice, wish to exercise your data protection rights, or would like to raise a concern or complaint regarding how your personal data is processed, you may contact our Data Protection Officer at:

Avrion Risk Ltd

Email: dpo@risk.avrion.com

Address: 128 Stoke Lane Westbury on Trym, Bristol, Avon, United Kingdom, BS9 3RJ

We will respond to your request in accordance with applicable data protection law.