

RevereStar Privacy Policy

16 October 2023

This privacy policy clarifies how we (RevereStar) process personal data relating to you (a prospective, current or former client).

How do We Obtain Your Personal Data?

Either:

- a) Directly from you (eg. contacting us for information or completion of an application form), or
- b) From a third party (eg. via data you provide as part of credit checks / referencing).

How Long Do We Keep Your Personal Data For?

Data on current / former clients is retained for a minimum of 6 years after the business relationship is concluded in case of dispute, audit, investigation or other legal or legitimate interest purposes. However, in some rare cases HMRC can investigate as far back as 20 years so normally we will keep records for at least this long unless we are satisfied there is no risk of such a longer investigation.

Data on prospective clients would typically be retained for a minimum of 12-24 months, eg. in case of follow up such as if we turned down an expression of interest but want to later offer you an opportunity that subsequently becomes available, or in case you later contact us at a future date and can therefore give you a personalised greeting. If the data we hold could be deemed potential important for a case of dispute (eg. containing reasons for turning down an application and want to demonstrate we have not discriminated) we would keep the data for a minimum of 6 years.

Who Do We Share Personal Data With?

It may be necessary to share your personal information with trusted third parties. Third parties may include, for example, auditors or to comply with legal checks.

Your personal information will be shared with Tide in cases where we generate and track invoices relating to business with you. We have ensured this complies with GDPR and their privacy policy can be found here: <https://www.tide.co/privacy/>
We will not divulge personal contact details to any other third-party organisation for marketing purposes without prior consent unless this is necessary to comply with a statutory obligation.

Data and files containing your personal data will normally be backed up to cloud service(s), specifically Google and Microsoft, but we have ensured it complies with GDPR and is encrypted in transit wherever possible. Part of being GDPR compliant means data is stored in the UK or an EU country, a country outside the EU for which the EU has made an adequacy decision under article 45 of Regulation (EU) 2016/679, or in the case of the USA, complies with EU-U.S., UK Extension to the EU-U.S., and Swiss-U.S. Data Privacy Frameworks.

Your Rights

You have certain rights regarding your personal data under GDPR. These are as follows:

- a) The right to be informed – to be told what your data is being used for. We will notify you if this privacy policy changes.
- b) The right of access – to be able to request copies of all data held on you. Contact us by post or email (details at the top of this page) and we should reply within 30 days. There is no fee for this but we reserve the right to charge a fee where requests are repetitive and/or require a greater degree of retrieval work.
- c) The right of rectification – to be able to amend any incorrect information. The accuracy of your information is important to us. Please contact us if anything changes.
- d) The right to erasure – to have your data removed from systems/storage. However, we may not be able to comply with such a request if your data is required, especially if required for legal reasons, for example.
- e) The right to restrict processing – to prevent processing, i.e. with regards to marketing.
- f) The right to data portability – to be able to have data stored in a medium that is easily transferred to you or a third party.
- g) The right to object - When you object to the processing and there is no legitimate overriding interest for continuing the processing.
- h) There are rights on automated decision making and profiling. Such processing may have been carried out by separate referencing organisations from whom we obtain your personal data, but we don't undertake such processing ourselves.

What Personal Data do We Obtain and What is The Legal Basis for Processing It?

We require your personal data for contractual reasons, for legitimate interest and for complying with legal obligations. The types of data are outlined in the table below:

What Data	Examples of Why We Hold the Data
Name	Maintaining contact, eg
Address / Office Location	a) to arrange meetings or follow up with prospective clients;
Contact details (eg. email, telephone)	b) to arrange visits with current clients;
	c) raise invoices, chase outstanding invoices, or other contractual obligations;
	d) communication regarding a contract, eg. to clarify requirements and deliver the requested service;
	e) or any other legal or legitimate interest purpose;
	f) I may also seek your views or comments on the services I provide;
	g) Notify you of changes to my services;
	h) Send you communications which you have requested and that may be of interest to you.
Bank Details	For crediting you in cases of any over-payment or refund.
Details collected by application or referencing, often including some details from above and others, eg. date of birth, employer details / reference, former addresses / personal or work-based reference, bankruptcy / county court search results, credit score, assessment score of suitability of client by referencing agency.	To assess suitability to enter into contract with a prospective client, and then retained in case of debt collection, or in case we are legally required to pass such information to a Government department, or in case needed by police, court or insurance company.

Questions or Complaints

Please contact using details in the header of this document if you wish to lodge an enquiry or complaint.

If you are not satisfied with our response and/or wish to report your concern to the relevant authority, please contact the Information Commissioner's Office:

<https://ico.org.uk/make-a-complaint/>

Helpline: 0303 123 1113

RevereStar is registered with the Information Commissioner's Office, ref: TBC (Search here: <https://ico.org.uk/register>)