

## **GDPR – General Data Protection Regulation:**

Revive Asset Limited are committed to keeping your data safe:

Revive Asset has updated its Privacy Policy to cover your rights under the new General Data Protection Regulation (GDPR)

Following the new General Data Protection Regulation (GDPR), we have updated our privacy policy, making it clear how we store your data and why we contact you.

We know that your personal data is important to you:

Revive Asset take the handling of your data very seriously and ensure that it is protected to the highest level and only collected for purposes that help Revive Asset provide you with the best service possible.

Privacy Policy (Last Updated 1 June 2024)

### **Introduction**

Revive Asset respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or use Revive Asset s services and tell you about your privacy rights by law.

Revive Asset is committed to the protection of personal data and the fundamental rights of data subjects, in compliance with relevant laws including the General Data Protection Regulation (GDPR) and any data protection, electronic communications or e-privacy laws, rules or guidance that are in force in the UK from time to time, including the Data Protection Act 1998 or 2018 or any successor legislation.

In order to support a robust approach to personal data protection and information security in general, Revive Asset has adopted the recommendations and industry best practices. Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Revive Asset collects and processes your personal data through our product and your use of this website or our services, including any data you may provide through this website when you engage our services, visit our web pages or contact us.

This website and our services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other notices or policies and is not intended to override them.

## **Definitions**

In this document, we adopt the same definitions as the GDPR, in particular:

### **Personal data**

means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person’.

### **Processing**

means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction’.

### **Controller**

means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law’.

**Data Subject**

means a natural person whose personal data is processed by a controller or processor’.

**Processor**

means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing’.

**Personal data breach**

means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed’.

**Data protection impact assessment (DPIA)**

also known as privacy impact assessment, means an ‘overall process of identifying, analysing, evaluating, consulting, communicating and planning the treatment of potential privacy impacts with regard to the processing of personally identifiable information, framed within an organization’s broader risk management framework’.

**Roles and responsibilities**

Revive Asset is responsible for your personal data and makes all the decisions about how your data is processed, we are acting as the controller. Revive Asset is responsible for this website.

In this Privacy Policy, references to “Revive Asset ” “we”, “us” or “our” means Revive Asset Limited. References to “you”, “your”, “yours” means you, the data subject.

We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Data Protection Manager using the details set out below.

### **Contact details**

Mr. Martin Byrne  
Revive Asset Limited  
The Silk Mill  
Oldham Road  
Ripponden  
Halifax  
HX6 4EB

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. In all cases, we have grouped together the different kinds of data we may or are likely to collect from you:

- Transaction Data which may include details about payments from you and other details of products and services you have purchased from us.

- Technical Data which may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and our product.
- Usage Data which may include information about how you use our website, products and services.

### **How is your personal data collected?**

How your personal data is collected will depend on your relationship with us, We use different methods to collect data from and about you including through:

- **Direct interactions.**

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you use our services.

- **Automated technologies or interactions.**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

### **How we use your personal data**

- Where we need to comply with a legal or regulatory obligation.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact	Performance of a contract with you
	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To deliver relevant website content and sector news of interest to you and measure or understand the effectiveness of the services we provide to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<b>Marketing</b>		
Revive Asset will NOT send you marketing communications under any circumstances..		
<b>Cookies</b>		
Cookies are small files placed on your computer, mobile phone or tablet which can log certain information about your visit. This information is often essential to the smooth operation of a website, for example a cookie may store the items you have in a shopping cart or your user details for a password protected area of a website. You can turn off cookies although we do not recommend this as it can cause some websites to operate incorrectly. For more information please visit <a href="http://www.allaboutcookies.org/">http://www.allaboutcookies.org/</a> .		
Our Cookies are used for the following		
<ul style="list-style-type: none"> <li>• We use cookies to record pages you have visited and options you have selected so we can display the correct information you have requested.</li> <li>• We use cookies to record anonymous statistics Google Analytics*.</li> </ul>		

\*This site uses Google Analytics tracking cookies to collect information about the use of this website – for example, how many pages people visit, what browser and operating systems they use, and how long they spent on each page. The information is anonymous, and is only used to help improve the site. The information is stored by Google.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it.

### **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties including: (a) Service providers who provide Investigative or allied services solely in connection with your matter
- We do not allow our third-party service providers to use your personal data for their own purposes.

### **Personal data breaches**

Revive Asset has established a personal data breach response procedure, adopting recommendations from ISO/IEC 29134:2017 and addressing privacy law requirements related to notification of personal data breaches.

### **International transfers of personal data**

Revive Asset will not share your personal data with third parties who may be established outside the European Economic Area (EEA), unless you agree for us to do so.

### **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.



To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data: see Request erasure below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, and other third parties who have a business need to know. They will only process your personal data on our instructions in accordance with GDPR and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Your rights**

Revive Asset shall keep records of data personal data processing activities and develop appropriate procedures to ensure it can satisfy your rights as a data subject where applicable, namely: **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. **Request erasure** of your personal data. The right to erasure enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply

with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact us

**What we might need from you** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond** We try to respond to all legitimate requests within the time scale allowed in law. Occasionally it may take us longer, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**If you are not satisfied** You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues [ico.org.uk](https://ico.org.uk) Our DPA number is ZA103513 We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.