



## **BACKGROUND:**

Reventus Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.reventus.co.uk](http://www.reventus.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested upon continued use of the site.

### **1. Information About Us**

Our Site is owned and operated by Reventus Ltd, a limited company registered in England under company number 04714602.

Registered address: 201 Haverstock Hill, Belsize Park, London, NW3 4QG.

Main trading address: Unit 44 HEC, Pindar Road, Hoddesdon, EN11 0FJ.

VAT number: 836 0655 24.

Email address: [info@reventus.co.uk](mailto:info@reventus.co.uk)

Telephone number: 03301 221 221.

In accordance with the General Data Protection Regulations 2016 ("GDPR"), Reventus Limited is registered with the Information Commissioner's Office ("ICO") as the data controller under registration No: Z234673X

We are regulated by:

- Taking Control of Goods Regulations 2013 – which set out the procedure enforcement agents must follow when taking control of goods.
- Taking Control of Goods (Fees) Regulations 2014 – which introduced a new fee regime for High Court Enforcement (replacing the multiple fee structures that were previously in place in disparate pieces of legislation and common law). The new structure is based on a staged approach with trigger points, which remunerate the officers for each stage undertaken.
- Certification of Enforcement Agents Regulations 2014 – which focused on the requirements an individual must meet before they are granted a certificate to work as an enforcement agent.

We are a member of:

- Civil Enforcement Association (CIVEA)
- British Parking Association
- The Institute of Revenues Rating and Valuation (IRRV)

## 2. What Does This Policy Cover?

This Privacy Policy applies only to customers and not to local authority users. The privacy policy applicable to local authority clients' users is available upon request (refer to section 11 to contact us) Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

## 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Section 11.
- b) The right to access the personal data we hold about you. Section 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Section 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Section 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

**We are processing your data under public task;** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller **and therefore do not need your consent.**

You **do not** have the following rights under public task:

- a) The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you;
- b) The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- c) The right to object to Us using your personal data for particular purposes; and

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Section 11.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

We would welcome the opportunity to resolve your concerns ourselves, so please contact us first, using the details in Section 11.

If you have any continued cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

## 5. What Data Do You Collect and How?

We will be given personal data by our clients and provided by other relevant sources in order to fulfil our role in the collection of local authority revenue under the Tribunals, Courts and Enforcement Act 2007 and other relevant legislation.

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see how we use Cookies and similar technologies in our Cookie Policy.

Data Collected	How We Collect the Data
Identity Information including name, title, date of birth, gender, marital status, social media posts.	From our Local Authority clients, Experian, Ascendant Solutions and direct from the data subject.
Sensitive data including ethnicity, disabilities, medical history and criminal convictions	From our Local Authority clients and direct from the data subject.
Contact information including email, addresses, telephone number, postcode	From our Local Authority clients, Experian, UK Search Ltd and direct from the data subject.

Employment information including employer, job title, referees	From our Local Authority clients, online job boards and direct from the data subject.
Financial including benefit award, bank details, debit/credit card, credit history.	From our Local Authority clients, Experian, Ascendant Solutions Ltd and direct from the data subject.
Other information including vehicle registration number	DVLA
Technical information including IP Address, browser type and version, operating system.	Direct from data subject.
Audio and visual information	Direct from data subject via our use of Body Worn Cameras, or call recording

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	<p>Identity Information including name, title, date of birth, gender, marital status, social media posts.</p> <p>Contact information including email, addresses, telephone number.</p> <p>Employment information including employer, job title.</p> <p>From our Local Authority clients, Experian, Ascendant Solutions Ltd and direct from the data subject.</p> <p>Other information including vehicle registration number</p>	Article 6(1)(e) - public task
Administering our business.	Sensitive data including ethnicity, disabilities, medical history and criminal convictions.	Article 6(1)(e) - public task Article 9(2)(f) – legal obligation
Analysing our website traffic	Technical information including IP Address,	Article 6(1)(a) - consent

	browser type and version, operating system.	
Keeping our staff safe	Audio and visual information.	Article 6(1)(a) - consent

For example:

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Section 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights,

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name, title, date of birth, gender, marital status, social media posts.	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.
Sensitive data including ethnicity, disabilities, medical history and criminal convictions	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.
Contact information including email, addresses, telephone number.	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.

Employment information including employer, job title.	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.
Financial including benefit award, bank details, credit history.	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.
Other information including vehicle registration number	Due to the nature of our work, that we will keep this data for the lifetime of the business. We will make sure that data is properly secured and maintained and that individuals' rights are respected. This is reviewed on a yearly basis.
Technical information including IP Address, browser type and version, operating system.	26 Months
Audio information	2 months / with incident 6 years
Visual information	12 months / with incident 6 years
DVLA Information	24 Months

If you have any questions in relation to our retention periods, please contact the data protection officer at: Unit 44 HEC, Pindar Road, Hoddesdon, EN11 0FJ.

## 8. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

Individual Clients (Local Authorities) who instruct us to work on their behalf.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply certain services.

Recipient	Activity Carried Out	Location
Civica	Secure cloud based systems called CivicaCollect and CollectVisit	UK, EEA and US <a href="https://www.civica.com/en-gb/policies-and-statements/privacy-notice/">https://www.civica.com/en-gb/policies-and-statements/privacy-notice/</a>
Key IVR	Processing payments	UK Based <a href="https://www.keyivr.com/privacy-policy/">https://www.keyivr.com/privacy-policy/</a>
Worldpay	Processing payments	EU-U.S. Privacy Shield Framework <a href="https://www.worldpay.com/uk/worldpay-privacy-notice">https://www.worldpay.com/uk/worldpay-privacy-notice</a>
SagePay	Processing payments	EEA and US Privacy Policy: <a href="https://www.sagepay.co.uk/policies/privacy-policy">https://www.sagepay.co.uk/policies/privacy-policy</a>
Ascendant Solutions Ltd	Data Enhancement	UK - <a href="https://ascendantsol.co.uk/">https://ascendantsol.co.uk/</a>
Telsolutions	Dialler, Text & Voicemail Services	UK - <a href="https://telsolutions.co.uk/privacy-policy">https://telsolutions.co.uk/privacy-policy</a>
Experian	Tracing, Credit Risk & Affordability information	UK - <a href="https://www.experian.co.uk/">https://www.experian.co.uk/</a>
Destin Solutions	Performance & Management Solutions	UK - <a href="http://www.destin.co.uk/privacy/">http://www.destin.co.uk/privacy/</a>

Pitney Bowes	Postal Services	UK - <a href="https://www.pitneybowes.com/uk/privacy-statement.html">https://www.pitneybowes.com/uk/privacy-statement.html</a>
UK Search	Tele - appending	UK - <a href="https://www.uksearchlimited.com/ksupload/userfiles/Privacy-Policy-and-Fair-Processing-Notice-V6-UKSL-070918.pdf">https://www.uksearchlimited.com/ksupload/userfiles/Privacy-Policy-and-Fair-Processing-Notice-V6-UKSL-070918.pdf</a>
The SMS Works	Text Services	<a href="https://thesmsworks.co.uk/">https://thesmsworks.co.uk/</a>
Box Inc	Cloud Storage	EEA & UK - <a href="https://www.box.com/en-gb/gdpr">https://www.box.com/en-gb/gdpr</a>
CS Shredding	Shredding confidential documents	UK
Data Interchange PLC	DVLA Link Provider	UK
Welfare Together Ltd	Vulnerability Support for Customers	UK - <a href="http://www.welfaretogether.co.uk">www.welfaretogether.co.uk</a>

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in this section.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in this section.

#### 10. How Can I Control My Personal Data?

Your rights under the Data Protection Legislation are set out in Part 4.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

#### 11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of:

Data Protection Officer.

Email address: [info@reventus.co.uk](mailto:info@reventus.co.uk)

Telephone number: 03301 221 221.





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Postal Address: Unit 44 HEC, Pindar Road, Hoddesdon, EN11 0FJ

If you wish to complain about our policy or its use, please contact our:

Complaints Officer

Email address: [info@reventus.co.uk](mailto:info@reventus.co.uk)

Telephone number: 03301 221 221.

Postal Address: Unit 44 HEC, Pindar Road, Hoddesdon, EN11 0FJ

If you are dissatisfied our handling of any complaint you also have the right to raise concerns with The UK Information Commissioner: <https://ico.org.uk>

## 12. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to-date. This Privacy Policy was last updated on 01<sup>st</sup> November 2023.