RIGHT REVENUE LIMITED.

PRIVACY NOTICE

This version is effective from: 25 November 2024

1 INTRODUCTION

This privacy notice (the "**Privacy Notice**") explains how Right Revenue processes your personal data in connection with your use of https://www.rightrevenue.co.uk/ (the "**Website**") and/or the revenue management software solutions (our "**Platforms**") we provide to our corporate customers ("**Customer**"). The provision of our Website as well as our revenue management services including access to our Platform shall be considered together as the "**Services**").

This Privacy Notice also explains how we process your personal data if you are another individual that interacts with our business, including if you work for businesses that provide goods or services to us, apply to work for us, visit our premises or attend events that we host.

Please note that the Platforms are intended for use by our corporate customers to collect, store, and manage data for revenue management purposes, and your access to the Platform will have been granted by a customer by whom you are engaged.

In such circumstances, we are therefore acting on behalf of the relevant Customer in providing you access to the Platforms, and accordingly the Customer will have the right to: (i) control and administer your access to the Platforms; and (ii) access and process any personal data you submit or provide through use of the Platforms. In such circumstances the Customer will be the controller of the data you insert into the Platform and for this reason, this Privacy Notice should be read in conjunction with the privacy notices of the relevant Customer who you work for or otherwise engage with.

Please take a moment to read this Privacy Notice as it provides you with important information about your personal data, including the rights you have in relation to it. Your access to and use of our Website and/or Platforms is also subject to our Terms of Use.

Any changes we make to this Privacy Notice will be posted on our Website and/or Platforms, including to reflect any changes to our use of personal data or to comply with applicable law or regulatory requirements. Where possible we may notify you of these changes by email, but we encourage you to check this page regularly to keep up to date.

2 ABOUT US

In this Privacy Notice, "**Right Revenue**", "**we**", "**us**, "**our**" means Right Revenue Ltd Website and/or Platforms. Right Revenue will be the controller of your personal data for the activities described in this Privacy Notice except where we provide you access to our Platforms acting on behalf of our Customers in which case we will be a processor of your personal data and the relevant Customer will be a controller.

3 HOW TO CONTACT US

If you want more information or have any questions about our processing of your personal data or this Privacy Notice you can contact us using the following methods:

Email	ask@rightrevenue.co.uk
Post	5 Windmill Business Park Saintfield

	Ballynahinch BT24 7DX

4 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data through the following methods:

Personal data you provide to us	You may give us your personal data directly, for example, when you use our Services, contact us with enquiries, complete forms on our Website and/or Platforms, subscribe to receive our marketing communications or provide feedback to us.
Personal data we collect automatically, including through cookies and other similar technologies	When you access and use our Website and/or Platforms, we may collect Technical data and Usage Data automatically, including through our use of cookies and other similar technologies. For more information about this data please see our Processing Activities Schedule. For more information about our use of cookies and other similar technologies, please see the Cookies Section.
Personal data we receive from third parties	We may receive personal data from third parties. Such third parties may include event suppliers and organisations we work with, analytics providers, data suppliers, and third parties that provide technical services to us so that we can provide our Services.
Personal data that is publicly available	We may collect personal data that is available from public sources (including media publications) or that you or a third party may otherwise publish (for example on websites, posts on social media platforms, or speeches at events).

5 PERSONAL DATA WE CONTROL

We may process or otherwise be a controller of the following personal data:

Category	***Description***
Identity Data	First name; and last name.
Contact Data	Email address; telephone number; social media handle; and postal/delivery address.
Registration Data	Username; password; security questions and answers; and any other personal data that you may provide to register an account with us.
Professional Data	Job title and organisation that you represent (where you or your organisation supplies products or services to us).
Transaction Data	Details of Services purchased from us, including payment information (such as payment card details, bank account details and billing address).
Usage Data	Data observed or collected in relation to browsing activity on our Website and/or Platforms, interaction with our emails. This may include information about pageviews and events on our Website and/or Platforms; information about the webpage or other source that users were previously on before reaching our Website and/or Platforms; information about when the session started and ended, or other identifiers associated with a user or their device (e.g. a device's IDFA (iOS) or AAID (Android) or advertising cookie identifiers).
Technical Data	IP address; details of the Website and/or Platforms that you are viewing, such as full web page URL; browser type, device type and operating system and any other information available to us about the device you are using; geolocation; diagnostic data (including crash

	logs, launch time, hang rate and energy use, and any other data collected for technical diagnostics purposes), and any relevant unique identifiers assigned to a device or browser (including cookie identifiers).
Communication Data	Feedback, marketing and serving communications.
Recruitment Data	Data that is relevant to our recruitment activities or you volunteer during our recruitment process, including contact details, country of residence, nationality, together with other information including details of your eligibility to work (including documents and information that we may collect to verify this); your work preferences (including areas and dates where you are available for work); skills, qualifications, training and work history; any personal data which appears in your curriculum vitae or application; and any other personal data that you volunteer during our recruitment process.

6 OUR PROCESSING ACTIVITIES

We process or are otherwise a controller of your personal data for the following purposes:

(a) to provide you with access to our Website and/or Platforms;

(b) to provide you with Services;

(c) to deal with customer services and enquiries, carry out surveys and obtain feedback and promotional material;

(d) to carry out insight and analytics;

(e) to carry out our promotional and marketing activities;

(f) for recruitment purposes; and

(g) for business administration (including recruitment) and legal compliance purposes, including to exercise or defend legal claims.

For more information about our processing activities, including the personal data that is processed in connection with those activities, please see our Processing Activities Schedule.

7 COOKIES

Where indicated in this Privacy Notice, cookies, web beacons, pixel tags and other similar technologies ("**Cookies**") may be used the purposes described in this Privacy Notice. In addition to the information set out in this Privacy Notice, you can find out further information about the Cookies that we use on our Website and/or Platforms and find out how can manage your consent to the use of non-essential Cookies, by visiting our Cookie Sharing Personal Data

We only share personal data with third parties or other entities when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data and to maintain the confidentiality and security of it.

The circumstances where we may typically need to share personal data are set out in the table below, though please note that there may be other circumstances where we need to share personal data:

Third-party suppliers who provide applications/	We share personal data with third parties who support us in providing our Website and/or Platforms and help provide, run

functionality, data processing or IT services	and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics.
Payment providers and banks	We share personal data with third parties who assist us with the processing of payments.
Third-party post/email marketing and CRM specialists	We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
Event partners and suppliers	When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.
Recruitment agencies and related organisations	We share personal data with external recruiters and third-party providers that undertake background checks on our behalf.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
Law enforcement or other government and regulatory agencies and bodies	We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
Other third parties	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

8 YOUR RIGHTS AS A DATA SUBJECT

Depending on your location, you may have the following rights in relation to your personal data:

Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where

	possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to "block" or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the How to contact us section or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the How to contact section. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("**ICO**").

	Contact details for the ICO can be found on its website at https://ico.org.uk.

9 INFORMATION SECURITY

We are committed to keeping personal secure and we have implemented information security policies, rules and technical measures to protect personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, our personnel and data processors (third parties that process personal data on our behalf) are obliged to respect the confidentiality of the personal data relating to users of our Website and/or Platforms and those who purchase our Services.

10 HOW LONG WE KEEP YOUR PERSONAL DATA

We will only keep your personal data for as long as necessary for the purposes set out in this Privacy Notice. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

11 THIRD-PARTY LINKS AND SERVICES

This Privacy Notice only applies to personal data processed by us through your use of our Website and/or Platforms and/or in connection with our Services/business operations. Our Website and/or Platforms may contain links to third party websites, apps or services. We have no control over these third party websites, apps or services and this Privacy Notice does not apply to your interaction with the relevant third parties.

12 PERSONAL DATA OF MINORS

While our Services are not intended for use by, or targeted at, minors (individuals under the age of 18), this does not prevent minors from providing personal data to us. Where we do process personal data of minors, we will comply with all applicable laws and regulations relating to that processing.

13 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect personal data, or we need to collect personal data under the terms of a contract we have with you, and you fail to provide that personal data, we may not be able to fulfil any obligations that we owe to you, and we may not be able to enter into or perform a contract with you. This may apply where you do not provide personal data that we need to provide our Services or to process an application to register an account. In these circumstances, we may have to cancel the provision of the relevant Services to you, in which case we will notify you.

14 INTERNATIONAL PRIVACY LAWS AND REQUIREMENTS

We may transfer personal data to third parties (as described in the Sharing personal data section) that are located in countries that do not have data protection laws that protect personal data to the same standard as the **GDPR**. These third countries may not give you the same

rights as under the GDPR in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns.

When transferring personal data to third countries, we usually rely on one of the following:

a) **Adequacy decisions**: We may transfer your personal data to countries or organisations that have been deemed to provide an adequate level of protection for personal data by the European Commission, the UK Government, or any other relevant government body. This may include transfers to organisations that participate in the Data Privacy Framework as set out here.

b) **Contractual safeguards**: We may use specific contracts approved by the European Commission, the UK Government, or any other relevant governmental body to safeguard personal data. The contracts that we usually rely on are referred to as "Standard Contractual Clauses" or "SCCs", although we may from time to time use other approved mechanisms. To find out more about the SCCs we use, please see here (EU) and here (UK). You can also contact us using the contact details set out in the How to contact section.

PROCESSING ACTIVITIES SCHEDULE

This Schedule sets out detailed information about the purposes for which we process the personal data described Personal Data We Control section and the and the lawful bases we rely on to do so.

This Schedule is split into the following sections – please click on the link below to be taken to the relevant section:

1. Providing our Website and/or Platforms and carrying out other online activities
2. Provision of Services
3. Customer Services, Feedback and Relationship Management
4. Insight and Analysis
5. Marketing Activities
6. Business Administration, Compliance and Legal Affairs

1. **Providing our Website and/or Platforms and carrying out other online activities**

Purpose and Personal Data Processed	**Description**	**Lawful Basis (EU and UK)**
Delivery of our Website and/or Platform *Technical Data*	To provide our Website and/or Platform to you, including keeping our Website and/or Platforms ensuring that we are showing you the correct notices and information and recording your preferences in relation to our Cookies. Essential Cookies are used on our Website and/or Platforms for this purpose. Please see the Cookie Policy section for further information.	Legitimate interests – to provide our Website and/or Platforms effectively. Compliance with a legal obligation. Performance of a contract.
Support, maintenance and security *Identity Data* *Contact Data* *Registration Data* *Technical Data*	To administer and protect our Website and/or Platforms and users (including troubleshooting, fixing errors, analysis, testing, system maintenance, support, and security, including for fraud monitoring and prevention). To respond to user enquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Website and/or Platforms. To request feedback and to contact you about your use of our Website and/or Platforms. Essential Cookies are used on our Website and/or Platforms for this purpose. Please see Cookie Policy section for further information.	Legitimate interests – to run our business and to protect us and our users from harm. Compliance with a legal obligation.
Set up and manage user accounts *Identity Data* *Contact Data* *Communications Data* *Registration Data* *Technical Data*	To set up and manage user accounts, including to verify users when logging into accounts and secure areas of our Website and/or Platforms, which may be required to access to certain features, functionality, or benefits of our Website and/or Platforms. To contact users about their accounts.	Performance of a contract. Legitimate interests – to provide secure and effective access to the Website and/or Platforms. Note where we do this as a processor acting on behalf of our Customer, in which case we will rely on our Customer's lawful basis to process your data.

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Website and/or Platforms insight and analytics *Usage Data* *Technical Data*	To carry out Website and/or Platforms insight and analysis, so we can measure use of, and develop and improve our Website and/or Platforms. For further information about this activity, see the Insight & analysis section. Non-essential Cookies are used our Website and/or Platforms for this purpose. Please see the Cookies section for further information.	Consent (where non-essential Cookies are used on our Website and/or Platforms). Legitimate interests – to improve and enhance our Website and/or Platforms (where non-essential Cookies are not used).

2. Provision of Services

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Supply of our Services *Identity Data* *Contact Data* *Transaction Data* *Professional Data*	To register you as a customer (as an individual or corporate customer). To process and deliver your order for our Services, including to manage and collect any fees or charges from you (or your organisation). To maintain our customer databases. To keep a record of transactions for our Services.	Performance of a contract. Legitimate interests – to provide the Services in an effective, safe and efficient way, and to exercise our rights in relation to transactions, including to receive payment of monies owed to us. Compliance with a legal obligation. Note where we do this as a processor acting on behalf of our Customer, in which case we will rely on our Customer's lawful basis to process your data.

3. Customer Services, Feedback and Relationship Management

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Customer services and general enquiries *Identity Data* *Contact Data* *Transaction Data* *Professional Data* *Communications Data*	To manage and respond to any enquiry that you submit to us.	Legitimate interests – to help with your enquiry, provide a good standard of service and improve our customer services. Note where we do this as a processor acting on behalf of our Customer, in which case we will rely on our Customer's lawful basis to process your data.
Managing our relationship with you or the organisation you work for *Identity Data* *Contact Data* *Transaction Data* *Professional Data* *Communications Data*	To manage our relationship with you or the organisation you work for (where your organisation is a customer of, or supplier to, us), including to contact you about any matter concerning an order for order Services that you have placed, to contact our suppliers about goods or services that we have or may have purchased from them, and to provide you with other important information (including about changes to our terms and conditions or this Privacy Notice).	Performance of a contract. Legitimate interests – to provide those that we work with the best experience and to ensure effective business administration. Legitimate interests – to effectively manage our supply chains. Compliance with a legal obligation – to comply with our consumer rights and privacy obligations.
Survey and feedback *Identity Data* *Contact Data* *Transaction Data* *Communications Data*	To help us to monitor and improve our Website and/or Platforms and Services, and to assist with the selection of future service lines and to train our personnel, we may carry out surveys or ask you for feedback and/or testimonials.	Legitimate interests – to improve our Website and/or Platforms and our Services and provide them in an effective way.

4. Insight and Analysis

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Insight and analysis *Technical Data* *Usage Data* *Communications Data*	To carry out insight and analytics, including: • to carry out Website and/or Platforms insight and analytics, including counting users, gaining general insights about their interests and browsing habits, and learning what content and features of our Website and/or Platforms are most popular – these insights and analytics are used for the purposes described in the Insight & analysis section; • to count the open rate and measure the effectiveness of our marketing emails; • to gain general insights about customers and their purchase or use of our Services, so that we can develop future service lines; and • to analyse the success of our events, including assessing sign-up rates, online forums, and other online content, and collecting and analysing event feedback.	Legitimate interests – to develop and improve our Website and/or Platforms and our Services and to support other activities described in this Privacy Notice (where non-essential Cookies are not used). Consent (where non-essential Cookies are used).

5. Marketing Activities

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Marketing communications *Identity Data* *Contact Data* *Communications Data*	To promote our Website and/or Platforms, our Services, or to otherwise promote our business, including events, via email, telephone or post. To ensure that the marketing content that is provided to you is more likely to be of interest, our marketing communications may be personalised.	Consent (where marketing via email). Legitimate interests (where marketing via telephone and post) – to grow our business. You can unsubscribe from our email marketing by clicking the 'unsubscribe' link in our emails. You can also ask us to stop using your personal data for our direct marketing activities by contacting us using the details set out under the How to contact section.

6. Business Administration, Compliance and Legal Affairs

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Business administration and legal compliance *Identity Data* *Contact Data* *Usage Data* *Technical Data* *Communications Data* *Recruitment Data* *Professional Data*	To comply with our legal obligations. To enforce our legal rights or defend against potential legal claims. To protect the rights of third parties. To facilitate a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.	Legitimate interests – to operate our business effectively. Compliance with a legal obligation.

Purpose and Personal Data Processed	Description	Lawful Basis (EU and UK)
Recruitment *Identity Data* *Contact Data* *Recruitment Data*	To assess your suitability for any of our positions that you apply for. To communicate with you about the recruitment process. To keep records about our recruitment process. To comply with our legal and regulatory obligations in relation to recruitment. To review our equal opportunity profile in accordance with applicable legislation.	Performance of a contract. Legitimate interests – to ensure that we can make the best recruitment decisions. Compliance with a legal obligation.