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24<sup>th</sup> May 2018

Dear Sir/Madam,

As you may be aware, the law is changing with regards the Data Protection legislation and as of 25<sup>th</sup> May 2018, the 1998 Data Protection Act will be suspended and replaced by the General Data Protection Act or GDPR.

Sports Revolution is a Limited company incorporated in England and Wales and acts as both a 'data processor' and 'data controller' under the General Data Protection Act, with effect from 25<sup>th</sup> May 2018.

Please take your time to read the attached updates to our privacy notice, which explains what data we hold about you, why we need this data and how we process it.

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

Yours Sincerely,

Antony Marcou  
CEO Sports Revolution LTD



## **Privacy Policy** **A Policy for our Clients**

Sports Revolution is a limited company incorporated in England and Wales, registration number 03967680, with its registered office at Hyde Park House, 5 Manfred Road, London, SW15 2RS, and it provides sports marketing and sponsorship services to its clients. When we refer to 'we' in this policy, we are referring to Sports Revolution Limited. We are a 'processor' and 'controller' under the General Data Protection Regulation and the Data Protection Act 2018 (together the 'Regulations') in respect of the work we carry out for our clients and the data we hold of their behalf. We respect your privacy and are committed to protecting your personal data.

### **Basis for Processing**

The basis on which we process your personal data is one or more of the following:

- It is necessary for the performance of our contract with you
- It is necessary for us to comply with a legal obligation
- For our own legitimate interests, as long as your rights do not override our interests. For example, we might use your data in order to comply with fraud and crime protection or to perform a credit check via a third party before committing to a contract
- You have given us your consent (this can be withdrawn at any time by advising our Data Protection Manager) although we do not generally rely on this.

### **What data will we collect?**

We only collect information from you which is relevant to the matter that we are dealing with or the contract we have with you. When you contact us about providing sports marketing services or sponsorship sales, we will collect your personal information – name, address, email, contact details and telephone number. During the course of our work for you, we may collect further additional information such as passports and other ID documents, in order to comply with our regulatory requirements under Anti Money Laundering. For your shareholders, we will collect names and addresses. This information is known as 'personal data' under the regulations.

We do not collect information which would be referred to as being in a 'special category'. Special categories of data are those revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sexual orientation shall be prohibited.



### **How will we use your data?**

We may use your information for the following purposes:

- Provision of company services including advising and acting on behalf of clients
- Maintaining our accounts and records

### **Who will we share your information with?**

We will not disclose any information you have provided with third parties other than:

- Where you have given specific consent
- Other professional advisors or third parties where necessary to carry out your instructions
- If we need to do this as a result of a legal or regulatory duty to disclose the information

### **How long will we keep your information for?**

We will normally keep your information throughout the period of time that we do work for you and afterwards for a period of six years, as we are required to by law.

### **Transfers to countries outside the European Economic Area (EEA)**

We may, from time to time, transfer your personal data to a country outside of the EEA. Normally, this would only happen as part of the performance of your contract with us and as per your instructions.

If it is necessary for any other reasons, we will ensure that the appropriate safeguards are in place at all times.

### **Security Arrangements**

- We shall ensure that all the information that you provide to us is kept secure, using appropriate technical and organisational measures.
- We currently store our data on a secure cloud-based hub, accessed only by the appropriate members of our team.
- In an event of a personal data breach, we have in place procedures to ensure that the effects of such a breach, are minimised and shall liaise with you as appropriate.
- We cannot guarantee that any email sent to us will be received or that the contents will remain private during transmission. We have secured servers in place and any suspicious email activity is immediately placed into quarantine.



## What rights do you have?

You have the following rights under the GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object
- Rights concerning automated decision-making and profiling

### Right of Access

You have the right to see the information we hold about you.

- To access this, you need to request, in writing, to our Data Protection Manager, together with proof of identity.
- We will usually process your request free of charge and within 30 days but reserve the right to charge a reasonable administration fee and to extend the period of time by a further two months, if the request is manifestly unfounded or is very complex.

### Right to erasure

You have the right to ask us to erase your personal data in certain cases (details may be found in Article 17 of the GDPR)

- We will deal with your request free of charge and within 3 days but reserve the right to refuse to erase information that we are required to retain by law or regulation, or that is required to exercise or defend legal claims.

### Who can you complain to?

If you are unhappy about how we are using your information or how we have responses to your request, then initially, you should contact our Operations Director, Lucinda Thompson – [lucinda.thompson@sportsrevolution.co.uk](mailto:lucinda.thompson@sportsrevolution.co.uk).

If your complaint remains unresolved, you can contact the information commissioner's office, details are available at [www.ico.org.uk](http://www.ico.org.uk).