

# REVSTACKR PRIVACY POLICY

## Version 1.1

This Privacy Policy explains how Revstackr Ltd (Company Number: 16950228) trading as Revstackr (we, us, our) processes personal data:

- (a) as controller for our own business and account administration; and
- (b) as processor on behalf of our business clients for End-Customer Data.

### 1. Controller vs processor (preserved core content)

To understand your rights, we distinguish between two types of data:

#### A. Client Data (you)

We are the data controller for your billing and account information.

#### B. End-Customer Data (your leads)

You are the data controller. We are the data processor. We process this data only on your written instructions. We do not access, sell, harvest, or use your End-Customer Data for our own marketing purposes.

### 2. Who we are and how to contact us

#### 2.1 Controller details

Revstackr Ltd (Company Number: 16950228) is the controller of personal data described in this policy where we act as controller.

Registered office: Revstackr Ltd (Company Number 16950228) C/O Burton Varley Ltd Suite 3, 2nd Floor, Didsbury House, 748 - 754 Wilmslow Road, Manchester, M20 2DW, United Kingdom

Privacy contact email: [ryan@revstackr.co.uk](mailto:ryan@revstackr.co.uk)

#### 2.2 If you are an end-customer contact

If your data has been entered into the Services by one of our Clients, that Client is the controller and you should contact them directly to exercise your rights. We will assist the Client where required under the DPA.

### 3. Personal data we process as controller

We may process:

- (a) contact details (name, business email, phone number, job title, organisation);
- (b) account and subscription data (user details, plan details, billing contact details, payment status);

- (c) technical and usage data (IP address, device data, log data, feature usage);
- (d) communications (support emails, tickets, call notes);
- (e) marketing preferences and engagement data.

We do not intentionally collect Special Category Data in our role as controller and ask you not to provide it unless necessary and agreed.

#### 4. How we use personal data and lawful bases (controller activities)

We use personal data to:

- (a) provide and administer the Services and support (performance of contract);
- (b) manage billing, payments and renewals (performance of contract, legal obligation); (c) secure and maintain the Services (legitimate interests);
- (d) communicate service updates and notices (performance of contract, legitimate interests); (e) send B2B marketing (legitimate interests, and consent where required under PECR); (f) comply with legal obligations and respond to lawful requests (legal obligation).

#### 5. Sub-processors (preserved core content, expanded context)

5.1 We use trusted third-party infrastructure to deliver the Services. By using Revstackr, you acknowledge and agree to our use of the following subprocessors:

- HighLevel Inc. (USA): core CRM infrastructure and database.
- Twilio (USA): SMS and telephony gateway.
- Mailgun / LC Email (USA): email delivery infrastructure.
- Stripe (Global): payment processing.

#### 5.2 International transfers (preserved core content)

We ensure data transferred to the USA is protected through the UK extension to the EU-US Data Privacy Framework where applicable, and/or Standard Contractual Clauses and UK transfer tools as appropriate.

#### 6. Lead confidentiality (preserved core content)

No access policy: Revstackr staff do not access your specific client database unless you explicitly request support or we are required to do so by law.

No sale of data: Revstackr will never sell, rent, or share your End-Customer Data with third parties.

#### 7. Data retention (preserved core content, with controller retention added)

7.1 Active accounts: we retain Client account data for as long as the account is active. 7.2 Closed accounts: upon cancellation, we retain Client Data for 30 days to allow for reactivation, after which it is deleted, subject to legal retention obligations.

7.3 Controller retention: we may retain invoicing and contract records for up to 6 years after termination to comply with legal and accounting obligations.

## 8. Cookies

We use cookies and similar technologies on our websites and may use cookies within web-based user interfaces. For non-essential cookies on our marketing site, we obtain consent where required under PECR. See our Cookie Policy for details.

## 9. Your rights (controller data)

You may have rights including access, rectification, erasure, restriction, data portability, objection, and withdrawal of consent (where applicable). To exercise rights regarding controller data, contact us at [ryan@revstackr.co.uk](mailto:ryan@revstackr.co.uk).

## 10. Complaints

If you have concerns, contact us first. You also have the right to complain to the Information Commissioner's Office (ICO).

## 11. Updates to this policy

We may update this policy in accordance with the Policy change mechanism in the Agreement.

