



Privacy policy

Who are we?

Twig is a trading name of Reverberate Public Relations Limited, a limited liability company incorporated in England and Wales which is a 'controller' under the General Data Protection Regulation and the Data Protection Act 2018.

Whose data do we hold?

We may hold data about the following people:

- Customers and clients
- Suppliers and service providers
- Employees
- Advisers, consultants and other professional experts
- Complainants and enquirers

What data will we collect?

We will only collect information from you that is relevant to the matter that we are dealing with. In particular we may collect the following information from you which is defined as 'personal data':

- Personal details
- Family, lifestyle and social circumstances
- Financial details
- Business activities of the person whose details we are processing

Special categories

We may also collect information that is referred to as being in a 'special category'. This could include:

- Physical or mental health details
- Racial or ethnic origin
- Religious beliefs or other beliefs of a similar nature
- Criminal convictions
- Sexual orientation

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
- It is in our legitimate interests to do so
- You have given us your consent (this can be withdrawn at any time by advising our data protection officer)

How will we use your data?

We may use your information for the following purposes:

- Provision of marketing services and public relations services on behalf of clients
- Promotion of our services
- Maintaining accounts and records
- Supporting and managing staff
- Complying with our legal and regulatory obligations

Who will we share your information with?

We will never sell your information to third parties for marketing purposes. We will only ever share information with third parties that we work with as part of our normal delivery of business operations. This may include:

- Maintaining the Consultancy's accounts and records
- Promoting the Consultancy's services
- Supporting, training and managing the Consultancy's staff
- Complying with the Consultancy's professional, legal and regulatory obligations

We may also disclose your information to debt collection agencies if you do not pay our bills.

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 as we are required to do by law.

Transfers to third countries

We may hold data on Cloud-based servers that are not located in the UK. We will ensure that these servers provide adequate security and will take appropriate technical and organisation measures to ensure data security.



Security arrangements

- We shall ensure that all the information that you provide to us is kept secure using appropriate technical and organisational measures
- In the 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 the ICO and with you as appropriate.
- More Information is available from the data protection officer

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 a right to see the information we hold about you
- To access this, you need to provide a request in writing to our data protection officer, together with proof of identity
- We will usually process your request free of charge and within 30 days however we 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 vexatious and/or is very complex
- Full details are available in our data subject access policy which is available on request from the data protection officer.

Right to erasure

- You have a 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 30 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
- To exercise your right to erasure please contact our data protection officer



Who can you complain to?

If you are unhappy about how we are using your information, or how we have responded to your request, then initially you should contact us at hello@wearetwig.com

If your complaint remains unresolved then you can contact the information Commissioner's Office, details available at www.ico.org.uk