

Client Transparency Notice

(Processing of Personal Data within the Revan Platform)

Effective Date: October 2025

Controller: Nurithm Limited

1. Purpose of Processing

Revan is an AI-based consultancy system operated by Nurithm Limited to help clients analyse information and generate strategic materials. Clients may upload any documents or text they choose for this purpose.

2. Who Controls Your Data

- Controller for Revan processing: Nurithm Limited.
- Processor: OpenAI LLC / OpenAI Ireland Ltd acting under a signed Data Processing Addendum (15 Feb 2024, executed 9 Oct 2025).
- Sub-processors: Listed on OpenAI's public sub-processor register (e.g., AWS, Cloudflare).
- Independent controllers: Each client organisation for any further use of Revan outputs outside the platform.

Where a client uploads third-party personal data for analysis, Nurithm and the client act as joint controllers limited to that specific processing. Clients remain responsible for the lawfulness of data they supply.

3. Categories of Data

Data uploaded may include business or personal information contained in documents, communications, or notes. Nurithm does not actively collect special-category data and advises clients to avoid including such information unless strictly necessary.

4. Lawful Basis

- Contractual necessity (Art 6 (1)(b)) - to perform consultancy services.
- Legitimate interests (Art 6 (1)(f)) - to operate and secure Revan.
- Explicit consent (Art 9 (2)(a)) only if special-category data is intentionally uploaded.

5. Data Transfers

Processing occurs in the EU and US under the EU Standard Contractual Clauses (2021) and UK Addendum. These provide adequacy-level protection for cross-border transfers.

6. Retention and Deletion

- Active client data is retained for the duration of the subscription.
- Upon termination, all workspace data is deleted within 30 days.
- OpenAI may retain de-identified, aggregated data for system improvement; such data cannot identify any individual or client.

7. Security

Revan runs in OpenAI's SOC 2 Type II-certified environment with AES-256 encryption at rest, TLS 1.2+ in transit, workspace segregation, and mandatory multi-factor authentication. Nurithm cannot view client content.

8. Your Rights

You may request access, correction, erasure, restriction, or portability of personal data by emailing privacy@nurithm.com. OpenAI does not respond directly but assists Nurithm in fulfilling requests under the DPA.

9. Complaints

Questions or complaints can be addressed to Nurithm's Data Protection Lead at privacy@nurithm.com or to the ICO (or your local EU authority).

10. Summary

Inside Revan, Nurithm Limited is the controller and OpenAI acts as its processor. Clients become independent controllers for any downstream use of outputs or external data. Processing occurs under contractual and technical controls that meet UK and EU GDPR standards.