

Privacy Notice

AccuraData is located at First Floor, Independent House, Farrier Street, Worcester, WR1 1HB.

Company registration no. 12464062

ICO Registration: ZA781751

Our Data Protection representative can be contacted by email on:

kieran@accuradata.co.uk

This privacy notice describes how we collect, use and store personal information about you during and after your business relationship with us, in accordance with the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR).

AccuraData is a Data Controller. This means that we are responsible for deciding how we hold and use and store personal information about you. We are required under the DPA 2018 / UK GDPR to notify you of the information contained in this privacy notice.

We may update this notice at any time. If relevant (and feasible), we will notify you.

It is important that you read this notice, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

DATA PROTECTION PRINCIPLES

We will comply with all relevant data protection law (including the DPA 2018 / UK GDPR). This requires that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.
- 7. We are accountable as a Controller for the principles and individual rights with respect to the processing we undertake.

THE KIND OF INFORMATION WE COLLECT AND HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified, whether directly or indirectly. It does not include data where an individual cannot be identified (anonymous data).

We collect personal data across the business from our suppliers, clients, and business prospects. This is limited to full name, job title, email address, company name and address.

This personal data is collected primarily through enquiries from our website (https://www.accuradata.co.uk/).

This personal data is shared with external organisations who support our business operation. These organisations include:

- Gmail Business.
- CallSwitch Communicator 6 (Telephony).
- Hubspot CRM.

- AccuraData website.
- DataSoap.
- Lead Forensics.
- Google Analytics.

Personal data is stored on our Gmail Business server. Access to personal data on this is permission-based and is stored in the UK and EU, therefore is covered by the existing adequacy agreement.

HOW WE WILL USE INFORMATION ABOUT YOU

As a Data Controller:

We need all the categories of personal data detailed above to allow us to conduct our business operation. Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you are a client or supplier, then we will need to process your data in line with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below.

- * Administration of a contract we have entered with you and providing our products and services to you.
- * Sale of business-related data and the provision of business leads for AccuraData's clients, in order to generate business.
- * Business management and planning, including accounting and auditing. In these instances, we will share your personal data with our accountants and associated reporting platforms.
- * Planning for the on-boarding or termination of our contracting relationship.
- * Dealing with legal disputes involving you, or any disputes that may arise under the contract that we have with you or the way in which we provide our products and services to you.

Buying Data:

On the occasions we buy B2B marketing data for clients, this is limited to the named decision maker, company name, company details, telephone number and email address. Other types of business data such as turnover and industry classification or industry-specific details may also be processed alongside your personal data.

B2B marketing data is sourced from multiple companies and these businesses are aware of the way in which the data is processed. At any time, a data subject may make a request to identify where AccuraData Ltd has procured their data from.

We rely on legitimate interest as the legal basis of processing when supplying this data and a Legitimate Interest Assessment (LIA) has been completed for each campaign we run. To view the LIA for a campaign your data was processed for, please email us with details of the campaign.

When buying data for our clients, we are considered a Data Processor in our relationship with our supplier and a Data Controller in our relationship with our client. At the point the client converts a lead from a database we have provided, the client becomes the Data Controller.

We retain a copy of this data for six months, after which time it is deleted. This gives us reasonable time to handle any queries relating to data processed as a result of our business operations.

Buying Leads

AccuraData Ltd may purchase external Business-to-Business (B2B) marketing leads from reputable lead suppliers for the purpose of reselling these leads to our vetted clients. These clients operate in the B2B Energy, Telecoms, Merchant Services, Solar, and Financial/Insurance sectors. All leads are sourced and processed in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations (PECR).

A lead is only transferred to a client in real time when the data subject, typically a Business Decision Maker (BDM), explicitly agrees during a live call to be transferred for a quote regarding the client's services. No lead is sold or shared unless this real-time consent is obtained.

The categories of personal data processed may include:

- Business Decision Maker Name.
- Business Decision Maker Email Address.
- Business Decision Maker Contact Numbers.
- Business Name, Address, and Industry Type.

• Industry-Specific Business Information.

When buying leads for our clients, we are considered a Data Processor in our relationship with our supplier and a Data Controller in our relationship with our client. At the point the client converts a lead from a database we have provided, the client becomes the Data Controller.

How Individuals can Access, Restrict, Object to and Erase their personal data:

A request can be made directly to us (kieran@accuradata.co.uk) or to the company we sourced your data from. To do this, please make a direct request and you will be provided with all of the personal data we hold on you, how this data came to AccuraData and all of the contact information for the supplier that your data came from.

DATA RETENTION FOR OUR BUSINESS

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

- If you are an active client of the business, we will retain your details on file for a period until the end of our business relationship, plus 2 years.
- If you are a prospect/enquirer of the business, we will retain your details for a period
 of 1 year, after which they will be deleted. If you want us to delete it before this time,
 please contact us and we will do so immediately.
- We will retain information relating to invoicing for a period of 7 years, including the current accounting year to satisfy HMRC requirements.
- In the event of us buying B2B data or Leads containing your data for our clients, your
 information will be held on file for six-months post-purchase. This is to ensure that
 we can accurately respond to any post-sale data protection and compliance queries.
 After this point, your data will be deleted from our systems.

RIGHTS OF ACCESS, CORRECTION, ERASURE & RESTRICTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your Rights:

<u>Subject Access Request</u> – this enables you to receive a copy of the personal information we hold about you. To action this request, please email the data protection contact:

kieran@accuradata.co.uk.

We require a suitable form of identification and under normal circumstances, we will supply this to you within one calendar month of your request and of identification being received. No fee is usually payable; however, we may apply an appropriate fee if the request is deemed to be excessive, or repetitive.

<u>Request Correction</u> – this enables you to have any incomplete or inaccurate information we hold about you corrected.

<u>Request Erasure</u> – this enables you to delete or remove personal information when there is no good reason for us to continue processing it.

<u>Object to Processing</u> – in certain circumstances, you have the right to request we suspend the processing of your data. Please contact us if you require more information on this.

<u>Request the Transfer</u> – you have the right to request the transfer of your personal data to a third party. Please contact us if you require more information on this.

<u>Right to Withdraw Consent</u> – where we rely on consent to process your data, you have the right to withdraw this at any time, without giving reason. To withdraw your consent, please contact the data protection officer. Once received, we will not process your data for the reasons you have agreed to, unless we have another legal basis for doing so.

<u>Right to complain</u> – you have the right to complain at any time to the Information Commissioners' Office (ICO) regarding data protection issues - https://ico.org.uk.

We reserve the right to update this privacy notice at any time. If you have any questions about it, please contact us at hello@accuradata.co.uk.

Last updated: 29th of July, 2025.