

PRIVACY POLICY

Introduction

Gravitas Limited Trading as the Lead Gen Dept. (“LGD”, “Gravitas”, “we”, “us”, “our”) is a provider of sales and marketing solutions (the “Services”).

In providing the Services, we contact businesses in relation to goods and services in which they may be interested and suit their business needs. This Privacy Policy sets out the data processing practices carried out through the operation of our Services and the use of our website.

Please note that all data captured and processed by Gravitas will be done so in accordance with the applicable data protection laws, including the GDPR.

Information collected

The information we collect about individuals is always relating to your professional life – your name, business contact details and your job role. This information is either provided to us directly by your business, provided to us from our customers, or collected by us from third parties – such as reputable UK datahouses & databrokers and social media, namely LinkedIn. We collect information from visitors to this website through the use of online forms and contact us webpages. We process and store your data when you email us with an enquiry.

In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies Policy for more details.

Use of personal information

In accordance with GDPR, we will only process your personal data where we have a lawful basis for doing so and only for the purpose for which it was gathered. In respect of your personal data, these bases are: where you have given your consent; and where it is in our (or a third party’s) legitimate interests to process your personal data, provided that none of these prejudice your own fundamental rights or freedoms.

Primarily, Gravitas collects, receives and processes personal data of individuals in a business context to contact them about goods and services in which their business may be interested. This information is processed by Gravitas in accordance with its (and its customers) legitimate interests. Specifically, the following are a list of the purposes for

which we process your personal data, and the lawful basis on which we carry out such processing:

Legitimate Business Interests:

- Contacting business contacts provided by our customers about our customer's various goods or services in which their business may be interested.
- Contacting individuals whose business may be interested in Gravitas' services.
- Contacting individuals whose business may be interested in various goods and services offered by our customers or potential customers.
- Enriching the details we have on business contacts with other information we hold so that we provide more tailored information about goods and services appropriate to the recipient's business.
- Obtaining information from data providers and publicly available sources about businesses which may be interested in our customers, and our potential customer's goods and services.
- Including you and your business in campaigns which you may be interested in whether you have contacted us via the website (including via our forms)
- Responding to enquiries and requests we receive from you
- Conducting market research in respect of our own services and the goods and services of our customers so we can better understand your business needs.
- Improving our website and services based on your use and / or your feedback so that it is as effective and easy to use as possible.
- We use the information collected from cookies that are strictly necessary for the operation of our website, including allowing you to interact with our website and to recall selections as you move between pages.
- We use the information collected from cookies that analyse your use of our website and monitor our web audience so we can continue to analyse and improve our website and services.

Freely given Consent: Supply 3rd party marketing material to you. You can opt out of marketing material at any time. Your information may be used to send you details of those products or services that we (or our customers) offer that we have identified as likely to be of interest to you. At the completion of any campaigns on behalf of our customers, we will pass your contact details to such customers if you have expressed interest in the goods and services offered through the campaign.

You will always have the right to opt-out of receiving marketing from us and we will always ensure that we screen any databases against the Corporate Telephone Preference Service prior to contacting businesses.

If you would like to opt-out of any marketing communications from us or limit the channels in which we contact you (such as email, phone or post only), please contact us at dataprotection@gravitas.com

Please note that even if you opt-out we may still receive your details from third parties and our customers in relation to specific campaigns and you may therefore need to notify our customers in order to opt-out from their marketing communications.

Call Recording

We may record telephone calls for training and quality assurance purposes to improve our services and ensure staff meet our standards. This is based on our legitimate interests as an outsourced sales provider, in line with GDPR and the Data Protection Act 2018. Recordings are used solely for training, stored securely with restricted access to authorised personnel, and retained for 30 days unless further time is needed to complete specific training reviews, after which they are deleted. You can request that we stop recording specific calls by contacting us at support@leadgendep.com. For more details, see our full data handling practices below.

Disclosures

We will share your data with our customers where you have expressed an interest in their goods and services. We may also share your data with third parties but only where:

- they process your data on our behalf and in accordance with this Privacy Policy;
- we have a written contract with the processor ensuring that your data is protected.

We may share your personal data with other members of our group of companies. Other than as set out above, we will not share your data with third parties unless we are obliged to disclose personal data by law, or the disclosure is necessary for purposes of legal proceedings, national security, taxation, or criminal investigation; or where we have your consent; or in relation to a takeover, merger or asset sale of our business.

Your rights

Under GDPR, you have the 8 data subject rights in regard to the processing of your data. However, the ones relevant to the processing we conduct are:

- **Right of Access:** You have the right to request a copy of the personal data that organisations process about you (commonly known as a “data subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.

- **Right to Rectification:** Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Right to Erasure (right to be forgotten):** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Right to Object:** Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground and where we do not have compelling legitimate interests to override such objection. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). Alternatively, we may refuse to comply with the request in such circumstances, such as if it is manifestly unfounded or excessive. Please be aware that the rights above are not absolute and there may be circumstances where we are unable to comply with your request. In such cases, we will explain why we cannot comply with the request.

If you would like to exercise any of your rights please contact us. Please note that we may need to verify your identity before being able to give effect to any request by you to exercise your rights.

You also have the right to complain to the Information Commissioner's Office in respect of the processing of your personal data (www.ICO.org.uk).

Internet-based transfers

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. We may use suppliers who help us provide our Services who are based outside of the EEA. Where we transfer your data to them for storage purposes, we will always take all reasonable steps to ensure adequate measures are in place to keep your data secure in line with the requirements of UK data protection legislation (including agreeing to European

Commission-approved standard contractual clauses presented by sub-processors who are ex-EEA).

Retention

We will only retain your data for as long as is necessary in accordance with the purposes set out in this Privacy Policy, and in any event no longer than 3 years from last contact, unless you ask us to erase it sooner.

Please note that if you opt-out of any marketing we will retain a record of your data to ensure that you do not receive any future marketing. – not really acceptable use of data – contact details can be erased or anonymised to ensure that no further marketing is sent.

Contact Us

If you have any questions or concerns about this Privacy Policy or our use of your personal data, please contact us at contact@leadgendept.com

Contact Information for Exercising Your Rights

If you have any queries about this Privacy Policy, wish to exercise your data protection rights (including the right to access, rectify, erase, restrict, object, or portability), or wish to lodge a complaint, please contact our Data Protection Officer via email at: privacy@leadgendept.com. We aim to respond promptly to any requests or concerns you raise.

Policy Review

This Privacy Policy was last reviewed and updated on 23 June 2025. We commit to reviewing this policy at least annually or whenever significant changes occur to our data processing activities, ensuring continued compliance and accuracy. Any changes made will be clearly communicated by updating the review date at the bottom of this document.

Review Date: 23 June 2025