

**Lead Forensics Privacy Statement**

Lead Forensics is software that reveals the identity of your anonymous website traffic and turns them into actionable leads within a business to business environment. As a leading provider of SaaS solutions, we are committed to providing a high calibre data led solution for all of our clients, as part of that we take data compliance extremely seriously and are pro-active in ensuring the compliance of both the SaaS solutions we provide to our customers as well as ensuring compliance as a business entity in our own right.

The purpose of this statement is to provide information regarding how and why Lead Forensics collect, process and store data, as well as providing the appropriate contact details should you wish to request the information we hold about you, withdraw from processing or request deletion of any data we hold about you.

Under the **EU General Data Protection Regulation (GDPR)** there are six lawful basis for processing personal data. These are detailed as follows:

* **Consent**

The individual has given clear consent for you to process their personal data for a specific purpose

* **Contract**

The processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract

* **Legal Obligation**

The processing is necessary for you to comply with the law (not including contractual obligations)

* **Vital Interests**

The processing is necessary to protect someone’s life

* **Public Task**

The processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law

* **Legitimate Interests**

The processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Further information regarding the lawful basis for processing personal data can be found at [ico.org.uk](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/)

**Lead Forensics Marketing and Sales Data**

As an organisation that processes business related data, Lead Forensics has assessed all six grounds for lawful processing of personal data and has selected ‘Legitimate Interests’ as the most suitable lawful ground for the processing of data for the purposes of Lead Forensics marketing and sales.

Lead Forensics collects, processes and stores data relating to businesses and decision makers. We believe that the individuals that we processes the data of, are likely to have an interest in the Lead Forensics product. Deemed as ‘Legitimate Interest’ this is based upon specific criteria including the business industry sector, size of organisation as well as the individual’s job function within the organisation. Our typically segmentation includes those within marketing, sales, business development, MD and owner related job functions, although this list is not exhaustive and other variables may apply.

We will only ever collect, process and store the essential information required for making contact with the data subjects within a business environment. The personal data we collect is limited to first name, last name, email address, social profiles (Limited to LinkedIN) and IP address. Other business related data may also be processed including business name, job function, turnover and business address, however we will never collect further personal data such as those classed under ‘Sensitive Personal Data’.

The data collected will be used to communicate marketing and sales messages relating to the Lead Forensics product, based upon the job function held by the data subject. Lead Forensics specifically only sends messages to those we believe are likely to be interested in the Lead Forensics product based upon the organisation they are employed by and based upon their job function within that organisation. Messages from Lead Forensics could be delivered via email, social media, via telephone or any other business to business (B2B) marketing methods that may be relevant.

**Legitimate Interest Assessment (LIA)**

Lead Forensics has carried out a Legitimate Interest Assessment (LIA) as advised by the ICO. Based upon that assessment it is deemed that the rights and freedoms of the data subjects would not be overridden in our correspondence regarding Lead Forensics and that in no way would a data subject be caused harm by our correspondence. Based upon our segmentation by organisation and by specific job function, coupled with our processing of personal data within the context of a business environment, we believe that any individual that receives correspondence from Lead Forensics in a direct marketing or sales capacity, could be legitimately interested in the Lead Forensics solution. It is also deemed that direct marketing and sales is necessary in the context of promoting Lead Forensics to professionals in business in order to increase awareness of our SaaS solution in the marketplace.

Per the ICO guidance, Lead Forensics can confirm:

* We have checked that legitimate interests is the most appropriate basis
* We understand our responsibility to protect the individual’s interests
* We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision
* We have identified the relevant legitimate interests
* We have checked that the processing is necessary and there is no less intrusive way to achieve the same result
* We have done a balancing test, and are confident that the individual’s interests do not override those legitimate interests
* We only use individuals’ data in ways they would reasonably expect
* We are not using people’s data in ways they would find intrusive or which could cause them harm
* We do not process the data of children
* We have considered safeguards to reduce the impact where possible
* We will always ensure there is an opt-out / ability to object
* Our LIA did not identify a significant privacy impact, and therefore we do not require a DPIA
* We keep our LIA under review every six months, and will repeat it if circumstances change
* We include information about our legitimate interests in our privacy notice

Lead Forensics has an in-house data verification team, who are responsible for ensuring the validity and quality of the data contained within the Lead Forensics CRM system ‘Cyclone’. The team continually cleanse the data held within the CRM system, completing a full cleanse cycle at least once every 12 months. Any records found to be out of date are placed into a deletion queue which is securely purged four times in a 12 month period.

**Right to Object**

In all correspondence with you we will give you the right to object from receiving further correspondence from Lead Forensics. On any emails you receive from Lead Forensics there will be the option to ‘unsubscribe’ from receiving any further email correspondence. If you receive a telephone call from us, you have the right to request not to receive any further calls. Lead Forensics has a companywide CRM system, your request to object will be logged within our CRM system to ensure that you do not receive any further calls.

You can also make a request to object by emailing [data-compliance@leadforensics.com](mailto:data-compliance@leadforensics.com), writing to Data Compliance, Lead Forensics, Building 3000, Lakeside, North Harbour, Portsmouth, PO6 3EN or by calling 0207 206 7293 and asking to speak with the Data Compliance Team.

**Request for Deletion**

It is important to understand the difference between a right to object and a request for deletion. If you request deletion, we will remove any data we hold about you from our systems. This will also mean that we will remove you from our suppression files. If you are removed from our suppression files, there is a risk that we may contact you again in the future if your details are re-added to our systems by a sales person who genuinely believes you may have a legitimate interest in the Lead Forensics product. If you do not wish to receive correspondence from Lead Forensics in the future would be to request a right to object rather than a request for deletion, as this will ensure that your details are always suppressed from receiving correspondence.

The option however is yours, and in either case we will process your request within 30 days.

**Request for Data Held**

You may request that we send you all of the data we hold that relates to you. Please make your request in writing by emailing [data-compliance@leadforensics.com](mailto:data-compliance@leadforensics.com) or by writing to Data Compliance, Lead Forensics, Building 3000, Lakeside, North Harbour, Portsmouth, PO6 3EN. We will process and respond to your request within 30 days, this service will be free of charge.

**The Lead Forensics Product**

The Lead Forensics product is a market leading B2B sales and marketing enablement tool. It is SaaS software and provides businesses with insight relating to their website visitors. Lead Forensics works on the basis of reverse business IP tracking. A small tracking code is placed on businesses websites which then enables them to identify the business IP addresses of their website visitors.

Lead Forensics then matches the identified business IP address to a wholly owned global database of businesses and provides the business related contact information of key decision makers at those organisations. Lead Forensics does not identify any personal IP addresses, mobile devices or any other data than that associated with the business. The data held within the Lead Forensics product is stored in the UK.

Lead Forensics does provide its customers with the contact information of key decision makers at the organisations that have pro-actively visited the company website. As this information contains details including first name, last name, email address and LinkedIN profile this aspect of Lead Forensics does constitutes the processing of personal data and therefore, is required to be compliant with GDPR.

Lead Forensics will only ever provide data relating to the organisations that have pro-actively visited a customer’s website, in this regard it is anticipated that this data will be leveraged by Lead Forensics customers under the lawful basis for processing of Legitimate Interests. It is anticipated that Lead Forensics customers will select the most appropriate point of contact from the data provided by Lead Forensics to convey a highly relevant, targeted message either by email, telephone or by post to the business address to the point of contact. Any correspondence will be based upon their likely interest in the organisation’s product or service following their visit to the company website.

**Request to Object**

Any individual who has been identified as a website visitor by Lead Forensics has the right to object to receiving correspondence from a Lead Forensics customer by contacting them directly and requesting to object, you can find their specific processes for this by visiting their company website and reviewing their privacy policies.

Should you wish to withdraw from Lead Forensics processing your personal data for use by the Lead Forensics software, please make your request in writing by emailing [data-compliance@leadforensics.com](mailto:data-compliance@leadforensics.com) or by writing to Data Compliance, Lead Forensics, Building 3000, Lakeside, North Harbour, Portsmouth, PO6 3EN. All requests will be processed within 30 days. Please note that this applies only to the processing of your personally identifiable data, not that of the business data which does not fall under the remit of GDPR.

**Data Retention**

Lead Forensics has a continual cycle of cleansing and refreshing data, all data within the Lead Forensics product is verified at least once in a 12 month cycle. Any invalid records are placed into a deletion queue, which is then securely purged four times in a 12 month period.

This policy was last reviewed and updated on the 30th January 2018. Policies are periodically reviewed to ensure compliance with the current compliance environment.

For questions relating to this policy, please contact data-compliance@leadforensics.com