# **Privacy Policy**

#### Last Updated: 24/04/2025

At **Engineered Outbound Limited (t/a Engineered GTM)** ("we," "us," or "our"), we are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal information in accordance with the UK Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2020.

By accessing or using our services, you agree to the collection and use of information in accordance with this policy.

#### **1. Information We Collect**

We collect and process personal data that you provide to us directly when you use our services. This may include:

- **Contact Information**: Name, email address, phone number, and other communication details.
- **Company Information**: Business name, company size, industry, role within the company, and other relevant details.
- **Other Information**: Any other information you choose to provide to help us improve our services or better understand your business needs.

Туре	Legal Basis	Purpose
Customer Identification Information	Consent	Customer Marketing, Direct Marketing, Administration
Employee Identification Information	Consent	Employee Management, Administration
Supplier or Partner identification Information	Consent	Supplier Management, Administration
Customer Financial Information	Consent	Customer Management, Administration
Employee Financial Information	Consent	Employee Management, Administration
Supplier or Partner Financial Information	Consent	Supplier Management, Administration

Employee Employment or Educational History	Legitimate Interest/Consent	Employee Management
Contracts with Employees, Customers and Suppliers	Legitimate Interest/Consent	Employee, Customer or Supplier Management, Administration

# 2. Legal Basis for Processing Your Data

Under the UK GDPR, we are required to inform you of the legal basis we rely on for processing your personal data. We process your personal data under the following legal bases:

- **Consent**: By providing your personal data through our website or other means, you consent to our processing of your data for the purposes outlined in this policy.
- **Contractual Necessity**: We may process your data when it is necessary to fulfil a contract with you or to take steps at your request before entering into a contract (e.g., providing done-for-you or done-with-you RevOps and Go-to-Market services).
- **Legitimate Interest**: We may process your data based on our legitimate interest, provided that these interests are not overridden by your rights and freedoms.

#### 3. How We Use Your Information

We use the information we collect for the following purposes:

- Provide and Maintain Services: To deliver, maintain, and improve our services.
- **Communication**: To send you important updates, respond to your inquiries, and inform you about changes to our services or privacy practices.
- **Customer Support**: To assist you with your requests, feedback, or concerns regarding our services.

Further details:

- **To provide and manage our services** including the delivery of our AI and technology powered allbound, performance of contracts, onboarding, and support.
- **To communicate with you** via email or messaging platforms for updates, service information, and customer support.
- **To manage internal operations** such as financial administration, legal compliance, planning, analytics, and team collaboration.
- To store and process information securely using cloud-based tools and platforms.

We may share your personal data with trusted third-party service providers that help us operate our business, including:

- **Google Workspace** for email, document management, cloud storage, and internal operations
- **Clay, Instantly, Apollo** for research automation, prospecting, and contact management
- **OpenAl, Anthropic, Google** for powering Al-driven services (non-sensitive data only, data is not used to train models)
- **Payment processors and e-signature providers** for contracts and billing (e.g. Stripe, DocuSign, Revolut)

We ensure that all third-party services comply with applicable data protection laws and use appropriate safeguards.

# 4. Cookies and Tracking Technologies

We use **cookies** and other tracking technologies (e.g., web beacons) to collect information about your usage of our website and enhance your user experience. These technologies help us:

- Monitor website traffic and usage patterns.
- Improve the functionality and performance of our website.

You can control the use of cookies through your browser settings. Most browsers allow you to reject all cookies or alert you when a cookie is being sent. However, please note that disabling cookies may impact your experience on our website and some features may not function properly.

#### 5. Data Sharing and Disclosure

We respect your privacy and do not sell or share your personal data with third parties for their marketing purposes. However, we may share your personal information in the following circumstances:

- Service Providers: We may share your data with trusted third-party service providers who assist us in delivering our services, such as payment processors, IT services, or customer support providers. These third parties are required to process your data only on our behalf and under our instructions, and they are obligated to protect your data.
- Legal Requirements: We may disclose your personal data when required by law or if we believe it is necessary to protect our rights, comply with a legal obligation, or respond to requests from law enforcement or regulatory authorities.

# 6. Data Retention

We will retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected or to comply with legal, accounting, or reporting requirements. Once your data is no longer needed, we will delete or anonymise it in accordance with applicable data protection laws.

## 7. Data Security

We implement appropriate technical and organisational measures to protect your personal data from unauthorised access, alteration, disclosure, or destruction. These measures include encryption, access controls, and secure storage.

However, please note that no method of data transmission or storage is completely secure. While we strive to protect your personal data, we cannot guarantee its absolute security.

# 8. Your Rights Under the GDPR

As a data subject, you have the following rights under the UK GDPR:

- **Right to Access**: You have the right to request a copy of the personal data we hold about you.
- **Right to Rectification**: You have the right to correct any inaccurate or incomplete personal data we hold about you.
- **Right to Erasure**: You have the right to request the deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected.
- **Right to Restrict Processing**: You have the right to request that we restrict the processing of your personal data under certain conditions.
- **Right to Data Portability**: You have the right to request a copy of your personal data in a structured, commonly used, and machine-readable format and to transfer that data to another service provider.
- **Right to Object**: You have the right to object to our processing of your personal data for direct marketing purposes or on grounds related to your particular situation, where we rely on legitimate interests for processing.

To exercise these rights, please contact us at hello@engineeredgtm.io. We will respond to your request as quickly as possible and always within the time frame specified by the UK GDPR (usually within one month).

#### 9. Children's Privacy

Our services are not intended for individuals under the age of 18. We do not knowingly collect or process personal data from children under the age of 16. If we become aware that we have inadvertently collected personal data from a child under 16, we will take immediate steps to delete that information.

#### **10. International Data Transfers**

We may transfer your personal data outside of the UK Economic Area, including to the United States, where some of our third-party service providers are located. Whenever we do so, we ensure that appropriate safeguards are in place to protect your personal data, in line with the requirements of the UK-GDPR. These safeguards may include the use of standard contractual clauses or other legally approved mechanisms.

## **11. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. If we make significant changes, we will notify you by posting the updated policy on this page, along with the new effective date. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your data.

# 12. Contact Us

If you have any questions or concerns about this Privacy Policy or our privacy practices, or if you wish to exercise any of your rights under the UK GDPR, please contact us at:

- Email: hello@engineeredgtm.io
- Contact Address: 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX

We are registered with the Information Commissioner's Office (ICO) under Engineered Outbound Limited. You can contact the ICO if you are concerned about how your personal information has been used and are unhappy with our response. To make a complaint, follow this link: <u>https://ico.org.uk/make-a-complaint/</u>.