

Privacy Policy

Engineered Go-To-Market Limited, trading as Engineered GTM
27 Old Gloucester Street, London, WC1N 3AX
Company No. 15937674 | VAT No. 504 9239 92
Registered in England and Wales

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1. WHO WE ARE

Engineered Go-To-Market Limited (company number 15937674), trading as Engineered GTM ("we", "us", "our"), is the data controller responsible for the personal data we collect and process in connection with our website (engineeredgtm.io) and our business operations.

We are established in the United Kingdom and our processing activities are subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Where we process personal data of individuals located in the European Economic Area (EEA), Regulation (EU) 2016/679 (the EU GDPR) also applies to that processing.

Our registered address is 27 Old Gloucester Street, London, WC1N 3AX. We are registered with the Information Commissioner's Office (ICO) under registration reference ZB901345. If you have any questions about this Privacy Policy or how we handle your personal data, you can contact us at hello@engineeredgtm.io.

We have not appointed a representative in the EEA under Article 27 of the EU GDPR. Our processing of EU personal data is occasional, does not involve large-scale processing of special category data or data relating to criminal convictions, and is unlikely to result in a risk to the rights and freedoms of individuals. Should our processing activities change such that the appointment of a representative becomes required, we will update this policy accordingly.

2. WHAT THIS POLICY COVERS

This Privacy Policy explains how we collect, use, store and share personal data when you:

- (a) visit our website at engineeredgtm.io;
- (b) submit an enquiry via our contact form, live chat widget or email;
- (c) sign up to our newsletter or mailing list;
- (d) book a call or meeting via our scheduling tool (HubSpot Meetings);
- (e) engage us to provide consulting, advisory or implementation services; or
- (f) otherwise interact with us in a business context.

This policy applies to personal data we collect about individuals, including prospective clients, existing clients, their employees and representatives, website visitors, and contacts in our business development activities. It does not apply to data we process on behalf of our clients as a data processor in the course of delivering our services — that processing is governed by our Terms of Service and any applicable data processing terms agreed with the client.

3. PERSONAL DATA WE COLLECT

3.1 Information you provide to us

When you interact with us directly, we may collect:

- (a) **Contact and identity data:** your name, email address, phone number, job title, company name and any other information you include in a form submission, email or live chat message;
- (b) **Scheduling data:** when you book a meeting via HubSpot Meetings, we receive your name, email address, any notes you include, and the date and time of the booking;
- (c) **Marketing preferences:** whether you have opted in to receive our newsletter or other marketing communications;
- (d) **Engagement data:** information exchanged during the course of a client engagement, which may include details about your business, technology stack, team structure and commercial objectives; and
- (e) **Correspondence:** the content of emails, messages and other communications you send to us.

3.2 Information we collect automatically

When you visit our website, we automatically collect certain technical and usage data through cookies and similar tracking technologies:

- (a) **HubSpot tracking pixel:** we use HubSpot's analytics to track page views, referral sources, session duration and interactions with our website content. Where you have previously identified yourself (for example, by submitting a form), HubSpot may associate your browsing activity with your contact record in our CRM;
- (b) **Clay visitor tracking:** we use Clay's website visitor identification technology to identify the companies (not individuals) visiting our website based on IP address resolution. This provides account-level intelligence only and does not resolve to individual visitors; and
- (c) **Technical data:** your IP address, browser type and version, operating system, device type, time zone setting, and general geographic location (city/region level).

3.3 Information we obtain from other sources

In the course of our business development activities, we may obtain professional contact information (such as your name, job title, company name, business email address and LinkedIn profile URL) from publicly available sources, professional networking platforms (such as LinkedIn), B2B data enrichment platforms, and third-party data providers. We use this information solely for legitimate business-to-business communications and outreach.

3.4 Is providing your data mandatory?

Providing personal data via our website (for example, through a contact form, live chat or newsletter signup) is entirely voluntary. However, if you do not provide the information requested, we may be unable to respond to your enquiry or provide you with the information or services you have requested. Where you engage us to provide services under a contract, provision of certain personal data (such as contact details for the primary point of contact) may be necessary for us to deliver the services. We will inform you at the point of collection where provision of specific data is required and the consequences of not providing it.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

We process your personal data for the purposes and on the legal bases set out below.

4.1 Performance of a contract

Where you personally engage us to provide services (for example, as a sole trader or individual client), we process your personal data as necessary for the performance of our contract with you. This includes communicating with you about the engagement, delivering the services, invoicing and payment administration, and managing the client relationship.

4.2 Legitimate interests

We process personal data where it is necessary for our legitimate business interests, provided those interests are not overridden by your rights and freedoms. Our legitimate interests include:

- (a) where we contract with a corporate entity, processing the personal data of that organisation's employees, officers and representatives as necessary for the performance and administration of the engagement with their employer;
- (b) responding to enquiries submitted via our website, live chat or email;
- (c) operating, improving and securing our website;
- (d) analysing website traffic and visitor behaviour to improve our content and user experience;
- (e) identifying companies visiting our website (at the account level, not individual level) to inform our business development activities;
- (f) conducting business-to-business outreach to individuals in their professional capacity, using professional contact information obtained from publicly available or third-party sources;
- (g) maintaining our CRM and managing our sales pipeline;
- (h) administering and protecting our business, including troubleshooting, data analysis and system maintenance; and
- (i) establishing, exercising or defending legal claims.

4.3 Consent

Where you have given your consent, we process your personal data to send you our newsletter and marketing communications about our services, events and content. You can withdraw your consent at any time by clicking the unsubscribe link in any marketing email, or by contacting us at hello@engineeredgtm.io. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

For the avoidance of doubt, our business-to-business outreach activities described in clause 4.2(f) above are directed to individuals at their corporate email addresses. In the United Kingdom, we rely on the corporate subscriber exemption under Regulation 22A of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) for such communications, subject to including an opt-out mechanism in every message. Where we send marketing to individual subscribers (for example, sole traders or individuals using personal email addresses), we do so only with prior consent.

4.4 Legal obligation

We may process your personal data where necessary to comply with a legal obligation to which we are subject, including tax, accounting and regulatory requirements.

5. WHO WE SHARE YOUR DATA WITH

We do not sell your personal data. We may share your personal data with the following categories of recipients:

- (a) **Technology and service providers:** we use third-party platforms to operate our business, including HubSpot (CRM, marketing automation and meeting scheduling), Clay (data enrichment and workflow automation), Vercel (website hosting), and other SaaS tools involved in the delivery of our services. We may also transmit data (including data collected from website visitors or form submissions) to artificial intelligence platforms such as those operated by OpenAI and Anthropic for the purpose of enrichment, analysis, classification or automation in connection with our services. These providers process data on our behalf or as independent controllers in accordance with their own terms and privacy policies, and we select providers that maintain appropriate security standards (for example, Clay is ISO 27001 certified, SOC 2 compliant and GDPR compliant);
- (b) **Email and communications providers:** we use third-party platforms for email delivery and outreach, which process your name and email address to deliver messages on our behalf;
- (c) **Professional advisers:** our accountants, lawyers and insurers, where necessary for the provision of their professional services to us;
- (d) **Subcontractors:** individuals or firms engaged by us to assist in the delivery of our services, who are bound by obligations of confidentiality and data protection; and
- (e) **Law enforcement and regulators:** where we are required to do so by law, regulation or court order, or where necessary for the establishment, exercise or defence of legal claims.

6. INTERNATIONAL TRANSFERS

Some of the third-party providers we use (including HubSpot, Clay, Vercel, OpenAI, Anthropic and other SaaS platforms) are based in or operate servers in the United States and other countries outside the United Kingdom and the European Economic Area (EEA). This means your personal data may be transferred to and processed in those countries.

We ensure that all such transfers are made in compliance with applicable data protection law and that appropriate safeguards are in place to protect your personal data. The mechanisms we rely on include:

- (a) **Adequacy decisions:** where the relevant authority has determined that a country provides an adequate level of data protection. For transfers from the UK, this includes adequacy regulations made by the UK Secretary of State. For transfers from the EEA, this includes adequacy decisions adopted by the European Commission, including the EU-US Data Privacy Framework (DPF) for transfers to certified US organisations;
- (b) **Standard Contractual Clauses (SCCs):** for transfers from the EEA, we may rely on the EU Standard Contractual Clauses adopted by the European Commission under Article 46(2)(c) of the EU GDPR. For transfers from the UK, we may rely on the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU SCCs, as approved by the ICO; and
- (c) **Other approved mechanisms:** including binding corporate rules or any other transfer mechanism approved under applicable data protection law.

Many of our US-based providers participate in the EU-US Data Privacy Framework and the UK Extension to the EU-US Data Privacy Framework, which provide a recognised basis for transatlantic data transfers. You may request further details of the specific safeguards applied to any transfer by contacting us at

hello@engineeredgtm.io.

7. HOW LONG WE KEEP YOUR DATA

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, after which it is securely deleted or anonymised. The specific retention period depends on the nature of the data and the purpose of processing:

- (a) **Client engagement data:** for the duration of the engagement and for six (6) years following completion, in line with the limitation period for contractual claims under English law and our tax and accounting obligations;
- (b) **Enquiry and correspondence data:** for up to two (2) years from the date of the enquiry, unless the enquiry leads to an engagement (in which case (a) applies);
- (c) **Marketing and newsletter data:** until you unsubscribe or withdraw consent, after which we will suppress your details to ensure we do not contact you again;
- (d) **Website analytics data:** in accordance with the retention settings of the relevant analytics platform (typically up to twenty-six (26) months); and
- (e) **Business development contact data:** for up to two (2) years from the date of last interaction, subject to periodic review.

8. COOKIES AND TRACKING TECHNOLOGIES

Our website uses cookies and similar tracking technologies to distinguish you from other visitors, analyse usage patterns and improve your experience. The use of cookies is regulated in the United Kingdom by the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and in the EEA by the ePrivacy Directive (2002/58/EC) as implemented in each member state.

8.1 What are cookies?

Cookies are small text files placed on your device when you visit a website. They are widely used to make websites work more efficiently and to provide information to site owners.

8.2 Cookies we use

We use the following categories of cookies on our website:

- (a) **Strictly necessary cookies:** required for the website to function and cannot be switched off. They are typically set in response to actions you take, such as setting your privacy preferences or filling in forms. These cookies do not require your consent under PECR;
- (b) **Analytics and performance cookies:** these allow us to count visits and traffic sources so we can measure and improve the performance of our site. We use HubSpot's analytics cookies for this purpose. These cookies collect information in an aggregated form; and
- (c) **Functional and tracking cookies:** the HubSpot tracking pixel enables us to understand how visitors interact with our website and, where a visitor has previously identified themselves, to associate browsing activity with their contact record. The Clay tracking tag identifies the companies (not individuals) visiting our website based on IP address resolution.

The analytics, performance and tracking cookies described in categories (b) and (c) above are not strictly necessary for the operation of the website and are set only with your consent, which we obtain via a

cookie consent mechanism when you first visit our site. You may withdraw your consent at any time by adjusting your cookie preferences or by using the methods described below.

8.3 Managing cookies

You can manage or withdraw your consent to non-essential cookies at any time through our cookie consent tool, or by setting your browser to refuse all or some cookies. You may also set your browser to alert you when cookies are being set. If you disable or refuse cookies, some parts of the website may become inaccessible or not function properly. For more information about how to manage cookies in your browser, visit www.allaboutcookies.org.

9. YOUR RIGHTS

Under the UK GDPR, the EU GDPR and applicable implementing legislation, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to certain conditions and exceptions:

- (a) **Right of access:** the right to request a copy of the personal data we hold about you;
- (b) **Right to rectification:** the right to request that we correct any inaccurate or incomplete personal data;
- (c) **Right to erasure:** the right to request that we delete your personal data in certain circumstances (sometimes known as the "right to be forgotten");
- (d) **Right to restrict processing:** the right to request that we restrict the processing of your personal data in certain circumstances;
- (e) **Right to data portability:** the right to receive your personal data in a structured, commonly used and machine-readable format, and to request that we transmit it to another controller, where technically feasible;
- (f) **Right to object:** the right to object to our processing of your personal data where we rely on legitimate interests as the legal basis. Where you object, we will cease processing unless we can demonstrate compelling legitimate grounds that override your interests. You also have an **absolute right to object to processing for direct marketing purposes** at any time, and we will cease such processing immediately upon receiving your objection;
- (g) **Rights relating to automated decision-making:** the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects on you; and
- (h) **Right to withdraw consent:** where we rely on consent as the legal basis for processing, you have the right to withdraw that consent at any time.

We do not currently use your personal data for solely automated decision-making that produces legal or similarly significant effects on individuals. Where we use automated tools (including artificial intelligence platforms) for data enrichment, classification or analysis, such processing is used to support human decision-making only and does not produce automated decisions with legal or similarly significant effect.

To exercise any of these rights, please contact us at hello@engineeredgtm.io. We will respond to your request within one (1) month, or within such extended period as permitted by law where the request is complex or we receive a high volume of requests. We may ask you to verify your identity before processing your request. There is no fee for exercising your rights, although we may charge a reasonable fee or refuse to comply with a request that is manifestly unfounded or excessive.

10. RIGHT TO COMPLAIN

If you are unhappy with how we have handled your personal data, you have the right to lodge a complaint with a supervisory authority. We would, however, appreciate the opportunity to address your concerns before you approach a regulator, so please contact us in the first instance at hello@engineeredgtm.io.

If you are based in the United Kingdom, the relevant supervisory authority is the Information Commissioner's Office (ICO). The ICO can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Website: ico.org.uk. Telephone: 0303 123 1113.

If you are based in the European Economic Area, you have the right to lodge a complaint with the data protection supervisory authority in the EU member state of your habitual residence, place of work, or the place of the alleged infringement. A list of EEA supervisory authorities and their contact details is available at edpb.europa.eu.

11. DATA SECURITY

We have implemented appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage. These measures include the use of encrypted communications, access controls, secure hosting environments and contractual obligations on our third-party service providers. While we take all reasonable steps to protect your data, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

12. CHILDREN'S DATA

Our website and services are not directed at individuals under the age of eighteen (18). We do not knowingly collect personal data from children. If you believe that we have inadvertently collected personal data from a child, please contact us at hello@engineeredgtm.io and we will take steps to delete it promptly.

13. THIRD-PARTY LINKS

Our website may contain links to third-party websites, platforms and services (including LinkedIn, HubSpot and other tools). We are not responsible for the privacy practices or content of those third-party sites. We encourage you to read the privacy policy of every website you visit.

14. INFORMATION FOR US RESIDENTS

We are a United Kingdom-based business and do not currently meet the jurisdictional thresholds of the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), or comparable US state privacy statutes. However, we provide the following information for transparency.

We do not sell your personal information (as defined under the CCPA/CPRA). We do not share your personal information for cross-context behavioural advertising purposes. We do not knowingly collect or sell the personal information of individuals under the age of sixteen (16).

If you are a US resident and wish to enquire about the personal data we hold about you, request its deletion, or exercise any other rights you may have under applicable US state privacy legislation, please contact us at hello@engineeredgtm.io. We will respond to verifiable requests within the timeframes

required by applicable law.

15. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology or legal requirements. Any material changes will be posted on our website with an updated effective date. We encourage you to review this policy periodically. Your continued use of our website or services after any changes constitutes your acceptance of the updated policy.

16. CONTACT US

If you have any questions about this Privacy Policy, wish to exercise your rights, or have a concern about how we handle your personal data, please contact us:

Engineered Go-To-Market Limited
27 Old Gloucester Street, London, WC1N 3AX
Email: hello@engineeredgtm.io

— End of Privacy Policy —

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