Lead Approved Privacy Notice

FOR CLIENTS AND
PEOPLE WE CALL
Q4 2026, OCTOBER TO DECEMBER

Privacy Notice

ABOUT THIS NOTICE

This notice explains how Lead Approved uses personal data when we find, screen and call people at businesses on behalf of our clients. It covers what we hold, where it comes from, why we use it, who we share it with, how long we keep it and the rights you have.

It sits alongside our Data Sourcing and Screening Process document, which explains in full how we source, screen, store and delete data. You can find it here: https://drive.google.com/file/d/1k1-K1WlYLWlJLbBNyIVHsVJ6zxjy7KmG/view

Version: Q4 2026, October to December.

1. WHO WE ARE

Lead Approved is a trading name of Noah Green Ltd, a company registered in England and Wales, company number 12553332.

We run business to business outbound calling campaigns for our clients. We find the right people at businesses that fit the agreed target market, screen their numbers, call them as an extension of the client team and book sales meetings for the client.

Contact for anything in this notice: Noah Green, Director, noah@leadapproved.com.

2. OUR ROLE AND THE ROLE OF OUR CLIENTS

(a) Lead Approved is the controller of the prospect data it sources and enriches, of its suppression list of people who have asked not to be contacted, and of its own business records.
(b) When we screen numbers, make calls, record call outcomes and prepare campaign data for a client, the client is the controller of that campaign data and we act as its processor, under a written agreement.
(c) Responsibility for how we source and process this data stays with Lead Approved and does not pass to our client.
(d) Our callers work as an extension of our client's team. On every call they introduce themselves as part of that team, explain why they are calling and give you the option to opt out. If you ask how we got your details, the caller explains that they come from a number of compliant business databases, usually checked against LinkedIn. If you are not sure which business a call was for, email us and we will tell you. If you would like a copy of this notice, the caller will email you a link to it.

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3. THE DATA WE HOLD

We hold business contact data about people in their work role:

(a) Name, job title and company details.
(b) Business email address.
(c) Business or mobile phone number.
(d) LinkedIn profile URL.
(e) Call outcomes, call notes and transcripts.
(f) Call recordings, where a call is recorded. The caller tells you when a call is recorded.

4. WHERE THE DATA COMES FROM

We do not collect this data from you before we call. We source it from:

(a) Airscale, our business data provider.
(b) Public sources, such as Companies House, company websites, business directories and Google Maps listings.
(c) LinkedIn profile and company data, retrieved through our data tools, which we use to check that a person still holds the role.
(d) Our clients, who tell us who must not be called, such as their current customers.

Business email addresses, where needed, are found and verified through Kitt, our email verification provider.

5. WHY WE USE IT

(a) To find the right decision makers at businesses that match the target market agreed with our client.
(b) To screen numbers against the Telephone Preference Service (TPS) and the Corporate Telephone Preference Service (CTPS) before any call.
(c) To call you about a business service that may be relevant to your company, and to book a sales meeting with our client if you want one.
(d) To record call outcomes and notes, so our client has an accurate record of each conversation.
(e) To keep a suppression list, so anyone who asks not to be contacted is never contacted again.

We do not make decisions about you by automated means.

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6. OUR LAWFUL BASIS

We rely on legitimate interests under Article 6(1)(f) of the UK GDPR, for business to business direct marketing to people in their professional role. Our clients rely on legitimate interests for their campaigns too. Business calls are also covered by the Privacy and Electronic Communications Regulations (PECR), which is why every number is screened before it is called.

Our legitimate interests assessment follows the three parts set by the ICO.

(a) Purpose. The interest is contacting businesses about a service relevant to them, to book a sales meeting. The benefit is commercial, for our client and for businesses with a real need.
(b) Necessity. Calling is the channel agreed for the campaign, and we use only what a business call needs. We contact only the decision makers named in the campaign strategy, up to an agreed number per company.
(c) Balancing. You are contacted in your work role, about your business, in business hours. People in business roles can reasonably expect relevant business approaches, and any impact is limited to a short call. Every number is screened against TPS and CTPS before dialling and re-screened at least every 28 days, and anyone who asks not to be contacted again is never called again.

7. WHO WE SHARE IT WITH

(a) The client we are calling for. Booked meetings, information requests, call notes, outcomes and transcripts are shared with that client.
(b) Our service providers, who process data for us under written data protection terms:

UKPhonebook, for TPS and CTPS screening.
GoHighLevel, our dialling system, for calls, call notes, recordings and transcripts.
Google Workspace, for storing and sharing campaign data with the client.
Slack, for internal call notes.

(c) The data tools named in section 4, which we use only to find and check contact details.

8. TRANSFERS OUTSIDE THE UK

Some of our service providers may process data outside the UK. Where they do, the transfer is covered by a UK approved safeguard, such as the International Data Transfer Agreement or the UK Extension to the EU-US Data Privacy Framework.

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9. HOW LONG WE KEEP IT

(a) Campaign data, including contacts, call outcomes, notes, recordings and transcripts, is kept only for the length of the client campaign.
(b) At the end of the engagement we transfer the campaign data to the client. Once the client has it, we delete it from our dialling system, Slack and company devices, and remove our copies from Google Workspace, unless the law requires us to keep a record. From then on the client is responsible for the campaign data it holds.
(c) We keep our suppression list of people who asked not to be contacted, so we never contact them again. It holds only the minimum needed to do that, such as the phone number.

10. YOUR RIGHTS

You have the right to:

(a) Access the personal data we hold about you.
(b) Have inaccurate data corrected.
(c) Have your data erased.
(d) Restrict how we use your data.
(e) Object to how we use your data. You have an absolute right to object to direct marketing. If you object, we stop contacting you straight away.

To use any of these rights, email noah@leadapproved.com. We reply within one month. If your request is about campaign data we hold for a client, we pass it to that client within five business days and help them answer it.

11. OPTING OUT ON A CALL

If you say on any call that you do not want to be contacted again, the caller ends the call politely and:

(a) Marks you Do Not Contact in our dialling system straight away, with the reason.
(b) Adds your number to our suppression list, so you are never called again, including after a re-screen or a new list.
(c) Tells our client in the next report, so their own team respects it too.

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12. DO YOU HAVE TO GIVE US ANY DATA

No. You do not have to give us any information. You can end a call or ask not to be contacted at any time.

13. COMPLAINTS

If you have a concern, please contact us first at noah@leadapproved.com. We acknowledge every complaint within 30 days and tell you the outcome without undue delay. You also have the right to complain to the Information Commissioner, the UK data protection regulator, at ico.org.uk.

14. IF YOU ARE OUR CLIENT

This notice also covers the people we work with at our clients.

(a) What we hold: your name, job title, business contact details, our agreement, invoices and payment records, emails and messages, and recordings, transcripts and notes of our meetings with you.
(b) Why: to deliver and manage the campaign, to invoice and take payment, and to keep our business and accounting records.
(c) Lawful basis: performance of our contract with your business, our legitimate interests in managing the relationship, and our legal obligation to keep accounting records.
(d) Who we share it with: our service providers Close (customer records), Fathom (meeting recordings and transcripts), Stripe (invoicing and payments), DocuSeal (contract signing), Google Workspace and Slack, each under written data protection terms.
(e) How long we keep it: for as long as we work together and up to two years after, except invoices and accounting records, which we keep for six years as the law requires.
(f) The rights in section 10 apply to you too.

15. CHANGES TO THIS NOTICE

We update this notice when our process changes. The version at the top shows the period it covers.