

Data management policy - GDPR

Ringhello client or prospect data

- 1) Personal data provided by prospects who complete our online form is retained by Ringhello Ltd for the express purpose of communicating with prospects about potential telemarketing campaigns the prospect has contacted us about. This is limited to name, telephone number(s), email address(es), employer, job title, and decision making capacity within that organisation.
- 2) This personal data is only ever shared with employees or subcontracted telemarketers of Ringhello Ltd, and only used in connection with the subject that we have been contacted about.
- 3) The personal data may be stored in our email systems and within our in-house CRM-type software.
- 4) Once a client ceases to work with us, we retain their personal data for a period of 24 months unless they have requested removal. After this, we delete the data on our software.
- 5) During this period we may use the data to contact the person about possible future work in accordance with our Legitimate Interest Assessment.
- 6) In the event that the prospect or former client advises us they wish for their data to be deleted, it will be removed from our email systems and software. If they advise us not to contact them again, we will record this information and suppress their details.

Data belonging to clients of Ringhello Ltd

- 1) Ringhello Ltd does not provide data lists for clients. Data is provided by clients for us to use, is occasionally procured from third parties, or manually sourced online. It is sometimes recorded as the result of communication with a company to establish an appropriate individual contact.
- 2) This personal data is only ever shared with employees or subcontractors of Ringhello Ltd or the client for whom it is collected/by whom it is provided. Use is limited solely for the telemarketing campaign it has been provided or collected for.
- 3) Telemarketing as a form of Direct Marketing is a legitimate interest for keeping this personal data.
- 4) Personal data held by Ringhello Ltd is limited to names, contact telephone number(s) and email address(es), employer, job title, and decision making capacity within that organisation. This is the minimum necessary to carry out telemarketing activities on behalf of our clients.
- 5) We carry out a check against the TPS and CTPS registers prior to any call being made if it has not been checked by our software within the last 28 days. If the number is registered, it remains suppressed to prevent contact being made on that number.

- 6) When communicating with a named individual, we will always attempt to ask a closing question to enable that individual to opt in to, or out of, future communication about the subject of the telemarketing campaign. The response to this question is date-stamped, time-stamped, and user-stamped.
- 7) In the event that a contact requests their data be deleted, we will advise them that complete deletion may not prevent a later manual re-addition to the list, and that deletion of their contact details along with a “requested no contact” notice against their name and job title would prevent this from happening. We will then delete or suppress details as requested, and this will be highlighted to the client for deletion or suppression from their systems.
- 8) When communicating with a named individual, we will always attempt to confirm that they are the appropriate decision-making individual at an organisation. This will confirm the need to process their data. If they are not the appropriate individual, their contact details will be suppressed.

General Notes

Ringhello Ltd is a collaboration of freelance telemarketers. We are primarily based within the UK, although we do have operatives in the EU, US and India should there be a need for campaigns to be carried out in different time zones, however campaigns to the UK or EU will be carried out by UK or EU-based operatives. All campaigns will be carried out using our software which is hosted within the UK.