

Open Letta Communications LTD

Customer Privacy Notice

Registered name: **Open Letta Communications LTD**. We are the controller of your personal data.

This privacy notice tells you what to expect us to do with your personal information.

Contents

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Telephone: 07462340142

Email: clarencethabom@gmail.com

What information we collect, use, and why

We collect or use the following information **to provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health information (including dietary requirements, allergies and health conditions)
- Health and safety information
- Account information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Call recordings
- Records of meetings and decisions
- Identification documents
- Information relating to compliments or complaints
- Information relating to sponsorship

We collect or use the following information **for the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information **for service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Call recordings
- Purchase or viewing history
- Website and app user journey information
- Information relating to sponsorship
- Records of consent, where appropriate

We collect or use the following information **to comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We collect or use the following information **for recruitment purposes**:

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information
- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (e.g. basic checks and higher security clearance)

We collect or use the following information **for dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a lawful basis for collecting and using your personal information. The lawful basis we rely on may affect your data protection rights, which are summarised below.

Your data protection rights

- **Right of access** – You have the right to ask us for copies of your personal information, including details about where we get it from and who we share it with.
- **Right to rectification** – You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Right to erasure** – You have the right to ask us to delete your personal information.
- **Right to restriction of processing** – You have the right to ask us to limit how we use your personal information.
- **Right to object to processing** – You have the right to object to the processing of your personal data.
- **Right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Right to withdraw consent** – Where we use consent as our lawful basis, you have the right to withdraw it at any time.

If you make a request, we must respond without undue delay and in any event within one month. To make a data protection rights request, please contact us using the details at the top of this privacy notice. You can find more about your rights and applicable exemptions on the ICO's website at ico.org.uk.

Our lawful bases for collecting or using personal information

Lawful bases for: providing services and goods

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information to enable us to provide and deliver our professional services, which include communications, public relations, branding, marketing, consultancy, and event-related services. Our legitimate interests are based on the need to operate as a functioning commercial organisation and to deliver services effectively to clients in line with agreed contracts, project scopes, and professional expectations.

Processing personal information allows us to communicate with clients and stakeholders, manage projects, deliver agreed outputs, coordinate events and campaigns, and ensure that services are completed efficiently and to a high standard.

We consider that individuals engaging with a communications and marketing agency would reasonably expect their personal information to be used for these purposes as part of the service delivery process. The use of this information is necessary for the proper functioning of our business and is proportionate to the services being provided. We do not use personal information in ways that are unexpected, excessive, or intrusive. We ensure that only information required for service delivery is collected and processed, and we apply appropriate safeguards including secure storage, access controls, and data minimisation practices.

We have carefully balanced our legitimate interests against the rights and freedoms of individuals. The impact on individuals is limited, as processing is primarily business-related and expected within a professional service relationship. Where appropriate, individuals retain the right to object to processing carried out on the basis of legitimate interests, and we will assess such requests in accordance with applicable data protection

law.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Lawful bases for: operation of customer accounts and guarantees

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information to manage and operate customer accounts effectively throughout the lifecycle of our business relationship. This includes maintaining client records, administering contracts, managing communications, processing invoices and payments, and ensuring the smooth delivery of services.

Our legitimate interests are based on the need to run an efficient and professional services business, maintain accurate records of client interactions, and ensure continuity and quality of service delivery. This allows us to respond quickly to client needs, resolve issues, track project progress, and maintain a clear record of work undertaken.

We consider that individuals would reasonably expect their personal information to be used in this way when entering into a professional service relationship with a communications and marketing agency. Processing is limited to what is necessary for account management and service delivery, and we apply appropriate safeguards including access controls, secure storage, and retention limits.

Individuals retain the right to object to processing based on legitimate interests, and we will carefully assess any such requests in accordance with UK data protection law.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Lawful bases for: service updates or marketing purposes

Consent – we have your permission after giving you all relevant information. All of your data protection rights may apply, except the right to object. You have the right to withdraw your consent at any time.

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information to communicate service updates, share relevant business information, and carry out

marketing activities related to our services. This includes informing clients and professional contacts about new offerings, updates to our services, industry insights, events, and opportunities that may be relevant to them.

Our legitimate interests are based on the need to promote and grow our business, maintain professional relationships, and ensure that clients and contacts are kept informed about services that may benefit them. As a communications and marketing agency, it is also part of our core business activity to engage with audiences in a professional and relevant way.

We ensure that our communications are relevant to professional contexts, proportionate, and limited to information that is reasonably expected within a business-to-business relationship. We do not use personal information in a way that unfairly overrides individuals' rights or freedoms. Individuals are provided with clear options to opt out of marketing communications at any time.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Lawful bases for: legal requirements

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information where it is necessary to comply with legal, regulatory, and statutory obligations applicable to our business. This includes obligations relating to taxation, accounting, corporate record-keeping, contract enforcement, and responding to lawful requests from regulatory or public authorities.

The purpose of this processing is to ensure that we operate lawfully, maintain accurate financial and business records, and meet our obligations under UK law. Processing is limited strictly to what is necessary to meet these obligations and is not used in ways that are unexpected or intrusive. We retain information only for as long as required under applicable legal and regulatory retention periods.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Lawful bases for: recruitment purposes

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information for recruitment purposes in order to attract, assess, and appoint suitable candidates for employment, freelance work, internships, or contractor roles within our organisation.

Our legitimate interests are based on the need to ensure that we can effectively recruit individuals with the appropriate skills and experience to support the operation and growth of our business. This includes reviewing applications, shortlisting candidates, conducting interviews, verifying qualifications, and maintaining records of recruitment decisions.

We ensure that only information relevant to recruitment is collected and used, handled securely and confidentially, with restricted access, secure storage, and defined retention periods. Where individuals exercise their rights under data protection law, including the right to object or request deletion, we will handle such requests in accordance with legal and regulatory requirements.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Lawful bases for: dealing with queries, complaints or claims

Contract – we collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests: Open Letta Communications Ltd has a legitimate interest in collecting and using personal information to effectively manage and respond to queries, complaints, and claims arising from our services. This includes handling client enquiries, resolving service-related issues, addressing concerns, and managing disputes in a fair and timely manner.

Our legitimate interests are based on the need to maintain high-quality service standards, protect our business relationships, and ensure that issues are resolved efficiently and transparently. We ensure that only information relevant to the matter is collected and processed, handled securely and confidentially, with strict access controls, secure storage, and retention limits.

Where individuals exercise their rights under data protection law, including the right to object or request deletion, we will assess and respond to such requests in accordance with legal and regulatory requirements.

For more information on our use of legitimate interests as a lawful basis, please contact us using the details at the top of this privacy notice.

Where we get personal information from

- Directly from you
- Schools, colleges, universities or other education organisations
- Councils and other public sector organisations
- Publicly available sources
- Previous employers

- Market research organisations
- Providers of marketing lists and other personal information
- Suppliers and service providers

Third-party sources

Open Letta Communications Ltd may share personal information with, or receive personal information from, third parties where necessary for the delivery and operation of our services. These include:

Professional service providers: Freelancers (designers, copywriters, videographers, consultants), PR and marketing collaborators, event production teams and contractors, and business advisors and strategic partners.

Clients, partners, and collaborating organisations: Corporate clients and business contacts, sponsorship partners and event stakeholders, media contacts and PR distribution partners, educational institutions, and government and public sector organisations where we deliver training or consultancy services.

Technology and service providers: CRM and client management systems, email and communication platforms, cloud storage and file-sharing services, website hosting and analytics providers, and marketing and social media platforms.

Financial and administrative providers: Accountants and bookkeeping services, payment processors and banking providers, and legal and compliance advisors where required.

Other third parties (where necessary): Regulators or law enforcement where legally required, professional bodies or auditors, and insurance providers where applicable.

We only share personal information with third parties where it is necessary for business operations, service delivery, legal compliance, or where we have a legitimate interest. All third parties are subject to appropriate confidentiality and data protection obligations.

How long we keep information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements. The specific retention periods for different categories of data are set out in our internal retention schedule.

For further information on how long we store your personal information, or the criteria we use to determine retention periods, please contact us using the details provided in this notice.

Who we share information with

Data processors

IT, cloud storage and document management providers

Providers of cloud-based infrastructure and productivity tools used to store, manage, and share business information securely. Examples include cloud storage, email hosting, and office productivity platforms. *Location: UK, EU, and/or USA-based providers with appropriate data protection safeguards.*

Customer Relationship Management (CRM) systems

Providers of CRM platforms used to manage client relationships, communications, project tracking, and contact records. *Location: UK, EU, or international providers with UK GDPR-compliant safeguards.*

Event management and media production tools

Providers used to manage events, registrations, attendee lists, and media production workflows, including platforms for organising conferences, training programmes, and public events. *Location: UK, EU, and*

international providers.

Project management and collaboration tools

Providers of platforms used to manage internal workflows, client projects, tasks, and communications.

Location: UK, EU, or international SaaS providers with appropriate safeguards.

Others we share personal information with

- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Professional consultants
- Organisations we are legally obliged to share personal information with
- Previous employers (for reference checks)
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us in the first instance using the contact details at the top of this privacy notice.

We will acknowledge your complaint and respond within one month. If you are unhappy with our response, or if you believe we are processing your personal data unlawfully, you also have the right to lodge a complaint with the UK's supervisory authority:

Information Commissioner's Office (ICO)

Website: ico.org.uk/make-a-complaint

Helpline: **0303 123 1113**

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF