

Legitimate Interests Assessment of Honch Data Limited

This legitimate interests assessment (LIA) sets out the justification for the processing of certain data by Honch Data Limited, a company registered in England and Wales under company number 12246723, and with registered office at 24 Sunnyside Road, Epping CM16 4JW (the “**Company**”).

The Company provides an online database, which may be accessed by sales and marketing departments, working within B2B companies across the UK. The database contains the following information, relating to individuals working in the UK:

- First name
- Last name
- Company name
- Job title
- Email address
- LinkedIn URL

All of this data is publicly available, save for some email addresses, first and last names and job titles, which are personal data. Therefore, email addresses of these individuals (that are not publicly available) are the subject of this LIA.

Process Name / Description	<p>To obtain first names, last names and job titles, the Company accesses public websites, including LinkedIn, Companies House and the content of press releases.</p> <p>To obtain email addresses, the Company starts from the basis of the individual’s first name, last name and Company website (which provides the email domain).</p> <p>The Company then tries different combinations of the individual’s name, alongside the relevant domain.</p> <p>The Company utilises validation services of third party providers (including but not limited to neverbounce, Zerobounce and The Checker) until a correct match is obtained. This enables the Company to ensure that the email addresses are accurate and up-to-date.</p> <p>Following confirmation of a correct match, the Company will accept the email address(es), and use that email address to contact the individual. The Company immediately contacts the individual with the information obtained (to ensure its reliability), to inform the user that he or she is being added to the Company’s database, and to inform the individual about how their data will be used in line with Article 14 of the GDPR.</p>
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Data Subject(s)	Individuals working in UK B2B organisations, including decision-makers and department heads across finance, HR, marketing, technology, and company leadership roles
Nature of personal data processed	Individual names (first and last names) and job titles (all of which are publicly available), and company email addresses (not publicly available)
Special category, criminal offence or children's data?	Not applicable.
Process owner	Anthony Cooper
Assessment Owner	Anthony Cooper

1) Purpose: identify the legitimate interest(s). Consider:

Why do you want to process the data – what are you trying to achieve?	To provide contact information on potential leads to sales and marketing professionals within UK B2B companies.
Who benefits from the processing? In what way?	Sales and marketing professionals, accessing the Company's database.
Are there any wider public benefits to the processing?	The Company's clients are provided with the highest quality data, and most accurate on the market. The Company also ensures that only relevant sales and marketing professionals, with information on relevant services and offers can contact the individuals included on the database.
How important are those benefits?	Without those benefits, the sales and marketing professionals would not be able to bring relevant offers to the market, and the individuals contained on the database may be contacted by non-qualified, non-relevant individuals on a more frequent basis.
What would the impact be if you couldn't go ahead?	<p>The database would be unable to function without deriving email addresses in this way. As a result, it would not be possible to provide the service to the Company's clients.</p> <p>In addition, individuals on the database would not receive the amount of free value (including training sessions and workshops) that they receive by being included on the database.</p>
Would your use of the data be unethical or unlawful in any way?	No.

2) Necessity: apply the necessity test. Consider:

Does this processing actually help to further that interest?	Yes – without deriving names, job titles and email addresses in this way, the sales and marketing professionals would not have verified contact information for potential leads.
Is it a reasonable way to go about it?	Yes – the third party verification tools used means that the email addresses contained on the database are

	verified as correct. The names and job titles are sourced from public websites, which is proportionate and does not invade the privacy expectations of the relevant individuals.
Is there another less intrusive way to achieve the same result?	No – the only other way would be to contact the companies where the individuals on the database work, which would cause more intrusion and greater business disruption. This would also create a burdensome pull on resources of the Company.
What is the nature of your relationship with the individual? Is it pre-existing and have you used their data previously?	There is no pre-existing relationship with individuals on the database.
How has the data been obtained? If supplied from a third party what did they tell the individual about reuse?	As detailed above, the Company utilises validation services of third party providers (including but not limited to neverbounce, Zerobounce and The Checker) until a correct match is obtained. The Company only uses email validation tools which are GDPR compliant.
Do you have the means and processes to keep the information up to date?	Yes – the Company contacts the individuals every month to ensure the information is kept up-to-date.
Is any of the data particularly sensitive or private?	No. Personal email addresses are never derived by the Company; only business email addresses. Names and job titles are publicly available online.
Would people expect you to use their data in this way?	Yes – there is generally a lower expectation of privacy with business email addresses, and the individuals contained on the database are routinely contacted by sales and marketing professionals in order to do business. In terms of individuals' names and job titles, this information is already publicly available, so no reasonable expectation of privacy.
Are you happy to explain it to them?	Yes – the Company provides quarterly updates to these individuals about how it is handling their data.
Are some people likely to object or find it intrusive?	This is unlikely.
What is the possible impact on the individual?	Potentially the individual can be contacted by salespeople they would prefer not to be contacted by.
How big an impact might it have on them?	The impact would be small – they may receive an email they do not want to receive. The individual would then contact the Company, and the Company would remove the individual's details from the database.
Are you processing children's data?	No.
Are any of the individuals vulnerable in any other way?	No.

Can you adopt any safeguards and technical measures to minimise the impact?	<p>Yes – before the individual is added to the database, the Company contacts him or her to provide clear guidance on how to be removed from, or not added to, the database. The Company sends an email reminder to the individual every 3 months, with instructions on how to remove themselves from the database.</p> <p>The Company also confirms the data is accurate every month.</p> <p>All data is confirmed by the Company with the Corporate Telephone Preference Service (CTPS).</p>
Can you offer an opt-out?	The Company offers an opt-out every three months, as detailed above.

Decision

Outcome Date	5th January 2026
Outcome	The Company has a legitimate interest to derive individuals' names, job titles and business email addresses.
Further Action	None identified.
Next Review date	5th January 2026
Agreed by	Anthony Cooper