Privacy Notice

TomCRM Limited

How TomCRM collects, uses and protects personal data

TomCRM-POL-003 Rev 2 | Issued 27 October 2026

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Privacy Notice

Document control	
Document number	TomCRM-POL-003
Title	Privacy Notice
Revision	Rev 2 (supersedes Rev 1 of 15 October 2026)
Date of issue	27 October 2026
Related documents	TomCRM-DPA-001 Data Processing Agreement; TomCRM-SLA-004 Service Level Agreement; TomCRM-POL-002 Acceptable Use Policy; TomCRM-RPT-001 Security and Continuity Statement
Approved by	The board of directors of TomCRM Limited, 27 October 2026
Owner	Tommy Findlay, Director and data protection lead
Review	At least annually, and whenever we add a supplier or change how we use personal data. Next review due by 27 October 2027
Published at	https://www.tomcrm.co.uk/privacy

Revision history

Revision	Date	Change
TCM-Doc-004 Rev 0	1 July 2024	First issue (customer privacy policy)
Website privacy policy	March 2026	Website visitor privacy policy at tomcrm.co.uk/privacy
TomCRM-POL-003 Rev 0	15 October 2026	Both replaced by one notice under TomCRM document control. Corrected the statement on international transfers, set out our two roles (controller and processor), added lawful bases, providers, retention and the right to complain to the ICO
TomCRM-POL-003 Rev 1	15 October 2026	Section 10 (Cookies) rewritten after a check of the website on 15 October 2026: the chat widget now loads only after consent or when the visitor starts a chat, and visitors can change their choice from the Cookie settings link
TomCRM-POL-003 Rev 2	27 October 2026	Section 4: notes and recordings of our calls and meetings added to the account row, and a paragraph saying we record and transcribe meetings as standard and that anyone can ask, before it starts, for a meeting not to be recorded. Section 5: Otter added as a provider; Gemini meeting notes covered under Google Workspace; Anthropic also used for meeting notes. Section 7: meeting notes and transcripts added to customer records

1. Who we are

TomCRM Limited (TomCRM, we, us) is a company registered in England and Wales under number 15662063, with its registered office at 128 City Road, London EC1V 2NX. We are registered with the Information Commissioner's Office under reference ZB691927.

Our data protection lead is Tommy Findlay, Director. Contact us about anything in this notice at hello@tomcrm.co.uk or on 01522 287313. We are not required to appoint a statutory Data Protection Officer and have not done so.

2. The two roles we play

We are the controller of the personal data described in this notice: information about visitors to our website, people who contact us, and the people at our customers who use and pay for TomCRM.

When our customers put their own contacts' personal data into their TomCRM accounts, the customer is the controller and we process that data for them as their processor, under the TomCRM Data Processing Agreement (TomCRM-DPA-001). If you are a customer's contact and want to exercise your rights, please contact that business first; we will help them respond.

3. What we collect and how

- Information you give us when you fill in a form on our website, take a scorecard or assessment, book a demo, sign up for our newsletter, or email or call us.
- Information about your business's users, billing and support when you become a customer.
- Technical information when you use our website, including analytics data, but only if you accept analytics cookies.

4. How we use it and our lawful basis

What we use it for	Personal data	Lawful basis
Replying to enquiries and demo requests made through our website, email or phone	Name, business, email, phone, your message	Legitimate interests (responding to people who contact us)
Producing the scorecard and assessment reports you request	Your answers, name, business, email	Legitimate interests (giving you the report you asked for)
Setting up and running your TomCRM account, support and onboarding	Names, job titles, business contact details and login details of your users; support correspondence; notes and recordings of our calls and meetings	Contract, and our legitimate interests in keeping an accurate record of what was discussed and agreed
Billing and taking payment	Billing contact and address; payment details are collected and held by Stripe, not by us	Contract
Keeping accounting and tax records	Invoices and payment records	Legal obligation

What we use it for	Personal data	Lawful basis
Sending our newsletter and product updates	Name and email	Consent, or for existing customers our legitimate interests under the soft opt-in, with an unsubscribe link in every email
Website analytics	Pages viewed, device and browser, approximate location	Consent, given through our cookie banner
Keeping our website and services secure and improving them	Technical and usage data, logs	Legitimate interests

We record and transcribe our calls and meetings as standard, usually with Gemini (the Google Meet note-taker) or Otter, or another transcription service that meets our data protection standards, so that decisions and actions are captured accurately and so we can improve, automate and streamline how we work. The recorder shows on screen. If you would rather a meeting was not recorded, tell us before it starts and we won't record it.

5. Who we share it with

We share personal data only with the providers we need to run our business and the service, each under a contract that protects it, and with our professional advisers or public authorities where the law requires. We do not sell personal data.

Provider	What it does for us	Where the data is held
HighLevel Inc.	The platform TomCRM runs on; also receives our website form submissions and newsletter sign-ups	United States
Google	Our email and documents (Google Workspace), including Gemini meeting notes in Google Meet, which are covered by our Google Workspace terms; and website analytics (Google Analytics 4, consent-gated)	United States and global
Otter.ai	Call and meeting transcription	United States
Supabase	Database for assessment responses	United Kingdom (London)
Vercel	Hosting for our website	United States and global
Resend	Delivery of assessment report emails	United States
Sanity	Content management for our website and blog	European Union and United States
Stripe	Payment processing	United Kingdom, European Union and United States
Anthropic	Ai assistance used by our team to read and draft support email and meeting notes	United States

Provider	What it does for us	Where the data is held
iS3 Ltd and TSLTD Limited	Delivery, configuration and support of the service by TomCRM's founders	United Kingdom

6. Transfers outside the UK

Some of our providers, including HighLevel, hold or access data in the United States. Where data leaves the UK we rely on the UK Extension to the EU-US Data Privacy Framework for providers certified under it, or on the UK International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses. You can ask us for details of the safeguard that applies to a particular provider.

7. How long we keep it

Record	How long we keep it
Website enquiries and contact form submissions	Up to 24 months from your last contact with us
Scorecard and assessment responses	Up to 12 months
Google Analytics data	14 months
Newsletter subscription	Until you unsubscribe
Customer account, contract and support records, including meeting notes and transcripts	For the life of the account and 6 years after it ends
Accounting and tax records	6 years after the end of the financial year they relate to
Data in a customer's TomCRM account (where we act as processor)	As set out in the Data Processing Agreement: deleted at the end of the 30-day export period after the account ends, unless the law requires otherwise

8. How we protect it

The TomCRM platform runs on HighLevel, which is certified to ISO/IEC 27001:2022 and encrypts data in transit and at rest. Access to customer accounts is limited to the people who need it, using individual logins and two-factor authentication. Our Security and Continuity Statement (TomCRM-RPT-001) gives more detail and is available on request.

9. Your rights

Under the UK GDPR you have the right to ask for a copy of your personal data, to have it corrected or deleted, to restrict or object to how we use it, to have it transferred to you or another organisation, and to withdraw consent at any time where we rely on consent. Email hello@tomcrm.co.uk and we will respond within one month.

If you are unhappy with how we have handled your personal data, please tell us first. You also have the right to complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

10. Cookies

Our website sets one cookie of its own to remember your cookie choice. Google Analytics cookies are set only after you accept them in our cookie banner. Our chat widget, provided

by HighLevel, loads only after you accept or when you click "Chat with us"; it then stores a session ID and how you arrived at our website in your browser's local storage so your conversation can continue. You can change your choice at any time using the Cookie settings link at the bottom of every page, or in your browser settings.

11. Automated decisions and Ai

Our scorecards and assessments produce an automatic score and report from your answers. This does not have any legal or similarly significant effect on you. Our team uses Ai assistance to help read and draft emails, and a person reviews anything that is sent.

12. Changes to this notice

We review this notice at least once a year. The revision number and date at the top show the current version, which is always published at https://www.tomcrm.co.uk/privacy. We will tell customers by email about any significant change.