

Legitimate Interest Assessment (LIA)

Company: LeadHootz

Date of Assessment: February 17, 2026

Subject: Processing of Professional Business Data for Outbound B2B Lead Generation

Overview

This assessment has been conducted to justify the processing of personal data under the lawful basis of **Legitimate Interests** as defined in Article 6(1)(f) of the UK/EU General Data Protection Regulation (GDPR).

1. The Purpose Test

Is there a legitimate interest behind the processing?

- **Objective:** To identify and provide professional business contact information to enable B2B commerce and targeted sales outreach.
- **Business Benefit:** LeadHootz provides a service that allows businesses to connect with relevant professional prospects, reducing the cost of customer acquisition and supporting economic growth.
- **Wider Public Benefit:** Enhancing the efficiency of the B2B marketplace by ensuring that business communications are targeted and relevant rather than speculative.
- **Impact of Non-Processing:** Without this processing, LeadHootz would be unable to provide its core service, and business clients would lack the necessary data to perform essential market outreach.

2. The Necessity Test

Is the processing necessary to achieve the stated purpose?

- **Effectiveness:** Yes. Direct outreach requires specific identifiers (Name, Job Title, Professional Social Profile, and Business Email).
- **Alternatives:** There is no less intrusive way to reach a specific B2B decision-maker. Mass advertising is more intrusive to the general public and less effective for business-specific solutions.

- **Proportionality:** LeadHootz only processes data that is strictly necessary for professional communication. We do not collect or process private home addresses, personal phone numbers, or sensitive categories of data.

3. The Balancing Test

Do the individual's rights and interests override the business's legitimate interest?

- **Nature of Data:** The data is professional in nature (e.g., job title and business location). It is typically data that individuals have made available on public-facing professional platforms (such as LinkedIn) with the reasonable expectation of being contacted for business purposes.
- **Sensitivity:** No "Special Category" data (health, religion, ethnicity) is processed.
- **Expectation:** Individuals operating in a professional capacity reasonably expect to receive B2B communications regarding products or services relevant to their specific job function.
- **Impact on the Individual:** The impact is minimal. The individual may receive a business-related message which they can choose to engage with, ignore, or opt-out of.
- **Safeguards:** * Strict adherence to "Right to be Forgotten" and "Opt-Out" requests.
 - Data is regularly verified to ensure accuracy and minimize "wrong person" contact.
 - No data is shared with third parties for purposes outside of B2B sales and marketing.