

PRIVACY & COOKIES POLICY

Patient Acquisition Hub Ltd

Company No. 15431935 | ICO Reg. ZC148168

5-7 Buck Street, London NW1 8NJ

Last updated: 09 June 2026

1. Introduction

This Privacy & Cookies Policy explains how Patient Acquisition Hub Ltd ("we", "us", "our") collects, uses, stores, and protects personal data in connection with the services we provide through two service brands:

- **Patient Acquisition Hub** (patientacquisitionhub.com) — a dental marketing agency serving independent dental practices in NW London (NW1, NW3, NW5, NW6), providing Google review automation, missed call recovery, reputation management, and hyper-local SEO.
- **Try Review Bloom** (tryreviewbloom.com) — a Google review automation and Google Business Profile (GBP) management service available to London local businesses across all verticals.

Both brands operate under Patient Acquisition Hub Ltd, a company registered in England and Wales (Company No. 15431935), registered with the Information Commissioner's Office under registration number ZC148168.

We are committed to complying with:

- UK Data Protection Act 2018
- UK GDPR (and EU GDPR where applicable)
- ICO guidance and best practices for data protection
- Healthcare-adjacent data handling standards relevant to dental practice clients

This policy applies to: dental clinic clients and their authorised staff; local business clients using Try Review Bloom; website visitors to either brand website; and any prospective client whose data we hold for outreach or onboarding purposes.

2. Roles & Responsibilities (GDPR)

Data Controller

Patient Acquisition Hub Ltd is the Data Controller for data collected directly through our websites and marketing activities. Each dental clinic or local business client is the Data Controller for their own customer/patient data.

Data Processor

Where we process data on behalf of a client — for example, processing patient contact details to send review request SMS messages or managing missed call automation — we act as a Data Processor under written instruction from the client.

3. What Data We Process

3.1 Google Review Automation Data (Try Review Bloom & PAH)

To deliver automated review request campaigns, we may process:

- Customer/patient first name and mobile number (provided by the client)
- Appointment timestamps used to trigger post-appointment SMS
- Review request delivery status (sent, opened, clicked)
- Whether a patient indicated a negative experience (routing to private feedback)
- Geographic keyword preferences set by the client (e.g. 'Camden', 'NW1')

We do not store clinical notes, treatment details, or diagnoses. Patient contact data is processed under a data processing agreement with the client.

3.2 Missed Call Recovery Data

To deliver missed call recovery SMS, we process:

- Call direction (inbound / outbound) and call status (missed, answered, voicemail)
- Call timestamps and callback timestamps
- Caller identifiers — irreversibly hashed using SHA-256 with a secret salt
- Booking link delivery and click status

Important: raw phone numbers are never stored in plain text. Caller identifiers are hashed immediately on receipt and cannot be reversed or reconstructed. Call-related data is retained for a maximum of 90 days before automatic deletion.

3.3 Google Business Profile (GBP) Management Data

For GBP management and local SEO services, we process:

- GBP listing details (business name, address, hours, categories, photos)
- Review content and star ratings (publicly visible data from Google)
- GBP performance metrics (views, searches, call clicks, direction requests)
- Competitor GBP data used for comparative audits (publicly available)

3.4 Reputation Monitoring Data

For reputation management services, we monitor:

- Public reviews on Google, Yelp, and Facebook
- Mentions in local community platforms where publicly accessible

We do not scrape or process private user data from any platform.

3.5 Client & Billing Data

For account management and billing, we process:

- Business name, registered address, and VAT/company number (where applicable)
- Authorised contact names, email addresses, and phone numbers
- Billing information — processed via Stripe (we do not store card details)
- Login credentials (passwords stored as hashed values — never plain text)
- Service usage history and correspondence records

3.6 Website & Technical Data

When visiting patientacquisitionhub.com or tryreviewbloom.com, we may process:

- IP address (short-term, for security and abuse prevention)
- Browser type, device type, and referral source
- Pages visited and session duration (aggregated analytics)
- Calendly booking data when a free strategy call is booked

3.7 Prospecting & Outreach Data

In the course of business development, we may hold publicly sourced contact data (business name, address, phone, email) for prospective clients. This data is sourced from Google Maps, public business directories, or publicly listed websites. We process this under legitimate interests for B2B outreach and delete it promptly on request.

4. Special Category Data

Our platforms do not intentionally process clinical health records or special category data as defined under UK GDPR Article 9. However, because dental practice clients use our systems in a healthcare-adjacent context, we apply enhanced security controls as a precautionary measure — including hashed identifiers, encrypted connections, and automatic data deletion schedules.

5. Lawful Basis for Processing

Processing Activity	Lawful Basis
Delivering contracted services to clients	Performance of a Contract (Art. 6(1)(b))
Missed call recovery & review automation on behalf of clients	Performance of a Contract
Sending review requests to customers/patients	Legitimate Interests of the client (B2B); Client's consent mechanism (B2C)
Website analytics	Legitimate Interests (aggregated, non-identifiable)
Billing & account management	Performance of a Contract; Legal Obligation
B2B prospecting outreach	Legitimate Interests (Art. 6(1)(f)) — proportionate B2B direct marketing under PECR

Audit logs & legal compliance	Legal Obligation (Art. 6(1)(c))
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6. How We Use the Data

We use data strictly to:

- Deliver Google review automation, missed call recovery, GBP management, and reputation monitoring services
- Send post-appointment review request SMS and email sequences on behalf of clients
- Route dissatisfied customers to a private feedback channel before reaching public review platforms
- Generate campaign performance dashboards and reports for clients
- Process billing and manage client accounts
- Maintain platform security and prevent unauthorised access
- Conduct B2B outreach to prospective clients (business contact data only)

We do not:

- Sell personal data to any third party
- Share data with advertisers or data brokers
- Use data for automated profiling or AI-driven decision-making affecting individuals
- Process clinical notes, treatment records, or patient diagnoses

7. Data Retention & Automatic Deletion

Data Type	Retention Period
Call metadata (missed call recovery)	90 days — automatic deletion via scheduled purge
Review request delivery data	Duration of client contract + 30 days
GBP audit & performance data	Duration of client contract + 6 months
Client account & billing data	Duration of contract + 7 years (legal requirement)
Website analytics (aggregated)	Rolling 26-month window — anonymised
B2B prospecting contact data	Until opt-out request or 12 months from last contact
Aggregated performance metrics	Indefinite — cannot be traced to individuals

8. Data Sharing & Sub-Processors

We do not share personal data with third parties except where necessary to operate our services. Where we engage sub-processors, we ensure GDPR-compliant data processing agreements are in place. Key sub-processors and categories include:

- **Stripe** — payment processing (card data never held by us)
- **SMS gateway provider** — delivery of review request and missed call recovery messages
- **Cloud hosting provider** — secure server infrastructure (UK/EEA or SCCs in place)
- **Analytics provider** — aggregated, anonymised website usage data
- **Calendly** — booking data for strategy calls
- **Google Workspace / Gmail** — client correspondence and account management

We will disclose data to law enforcement or regulators only where required by applicable law. We will inform clients of any legally permissible compelled disclosure.

9. Security Measures

We apply appropriate technical and organisational safeguards, including:

- SHA-256 hashing with a secret salt for all caller identifiers — irreversible by design
- Encrypted connections (HTTPS/TLS) across all web properties and APIs
- Role-based access control — client data is scoped and isolated
- Multi-tenant architecture — no cross-client data access
- Stripe tokenisation — no raw payment card data stored
- Audit logging of all sensitive data access events
- Automatic deletion schedules for call-related data (90-day maximum)

In the event of a personal data breach that poses a risk to individuals' rights, we will notify the ICO within 72 hours and affected clients as soon as reasonably practicable.

10. Your Rights Under UK GDPR

Individuals whose data we hold have the following rights:

Right	Description
Right to be Informed	To know how your data is collected and used — this policy fulfils that obligation
Right of Access	To request a copy of the personal data we hold about you
Right to Rectification	To request correction of inaccurate or incomplete data
Right to Erasure	To request deletion of your data (subject to legal retention obligations)
Right to Restrict Processing	To ask us to limit how we use your data in certain circumstances
Right to Object	To object to processing based on legitimate interests, including direct marketing
Right to Data Portability	To receive your data in a structured, machine-readable format

Rights re. Automated Decisions	We do not make solely automated decisions that significantly affect you
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To exercise any of these rights, contact us using the details in Section 14. Where we process data as a Data Processor on behalf of a dental or business client, we will redirect your request to the relevant Data Controller (the client).

11. Cookies Policy

11.1 What Are Cookies

Cookies are small text files placed on your device when you visit a website. They help the site function correctly and allow us to understand how it is being used.

11.2 Cookies We Use

Category	Purpose	Can Be Disabled?
Essential	Authentication, session management, security. Required for the platform to function.	No
Analytics	Aggregated, anonymised usage data (page views, session duration, traffic source). No individual tracking.	Yes
Third-Party	Calendly (booking), Google Analytics or equivalent (usage). Providers operate under GDPR-compliant agreements.	Yes

11.3 Managing Cookies

You can control and delete cookies through your browser settings. Disabling essential cookies may affect the functionality of our dashboards and portals. Analytics and third-party cookies can be disabled without impacting core service delivery. Browser-specific cookie management instructions are available via your browser's help documentation.

12. International Data Transfers

Where personal data is processed outside the UK or EEA — for example, via a US-based cloud hosting or analytics provider — we ensure appropriate safeguards are in place, including UK-approved Standard Contractual Clauses (SCCs) or adequacy decisions. We prefer UK/EEA-based providers where practically available.

13. Children's Data

Our services are directed at businesses and their adult customers. We do not knowingly collect personal data from individuals under the age of 18 through our websites or marketing activities. If a dental client's patient base includes under-18s, it is the client's responsibility (as Data Controller) to

ensure appropriate consents are in place before sharing any such data with us for review automation purposes.

14. Contact & Complaints

For any questions, data access requests, or complaints regarding how we handle personal data:

Company	Patient Acquisition Hub Ltd
Company No.	15431935
ICO Registration	ZC148168
Registered Address	5-7 Buck Street, London NW1 8NJ
Email	julien@patientacquisitionhub.com
Website (PAH)	patientacquisitionhub.com
Website (Try Review Bloom)	tryreviewbloom.com
Phone	020 8050 7468

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO):

- ICO website: ico.org.uk
- ICO helpline: 0303 123 1113

We would always prefer the opportunity to address your concern directly before you contact the ICO, so please reach out to us in the first instance.

15. Changes to This Policy

We review and update this policy periodically to reflect changes in our services, applicable law, or regulatory guidance. Material changes — particularly those affecting how we process client or customer data — will be communicated to active clients by email with at least 14 days' notice before taking effect. The current version of this policy is always available at patientacquisitionhub.com and tryreviewbloom.com.

This policy supersedes all previous versions. The former version dated 29 January 2026 is no longer in effect.