

RepGen Privacy Notice

Last updated: 20th March 2026

At RepGen, we take your privacy seriously. This notice explains how we collect, use, store, and protect your personal data, in line with the UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications Regulations (PECR).

Who we are

RepGen is a trading name of Anna Graham Limited, a company registered in England and Wales (Company No. 16946571), providing:

- Bespoke automation, analytics, and consulting services for clinical and service-based organisations

Data Controller:

Anna Graham Limited, a company registered in England and Wales (Company No. 16946571). Registered office: 20 Cranley Road, Walton-on-Thames, Surrey, KT12 5BP
Email: anna@repgen.ai

If you purchase consulting services, or receive marketing from us, Anna Graham Limited is the entity legally responsible for your data.

What data we process

We may process the following categories of data depending on your interaction with us:

If you use the RepGen app

- Account information (e.g., name, email address, organisation)
- Files you upload (e.g., audio files, documents, templates)
- Report templates and guidance documents you provide
- Technical data (IP address, device type, browser version)
- Usage logs for security, troubleshooting, and service improvement
- Payment/subscription information (via third-party providers)

If you receive outreach or contact us for business enquiries

- Business contact information (name, job title, email, organisation)
- Publicly available professional data (website, directories, LinkedIn)
- Interaction history with our communications (e.g., email opens, responses)

How we collect your data

We may collect data:

- Directly from you (e.g., account creation, uploading files, contacting us)
- Through your use of the RepGen app
- From publicly available sources (e.g., company websites, directories, LinkedIn)
- Via third-party tools or data providers that aggregate publicly available B2B information (e.g., Apify/Leads Finder, Apollo, or similar services)
- From contractors/freelancers working on our behalf
- When you interact with our emails or visit our website

We do not purchase consumer marketing lists.

Any third-party B2B data we obtain is limited to business contact information of professionals in relevant roles.

Why we process your data

We process personal data for the following purposes:

RepGen app users

- To provide the RepGen service (e.g., generating reports)
- To create and manage user accounts
- To secure our systems and detect misuse
- To improve and maintain the platform
- To provide customer support
- To manage billing and subscriptions

Consulting clients

- To deliver contracted services
- To communicate and manage projects

- For invoicing and record-keeping

B2B direct marketing

- To contact relevant professionals about RepGen or our consultancy services
- To maintain internal business development records

Lawful bases for processing

We rely on the following lawful bases under UK GDPR:

- **Contract** – for providing the RepGen app, consulting services, customer support, and billing.
- **Legitimate interests** – for B2B outreach to relevant professionals, platform security, analytics, and service improvement.
- **Consent** – where required for cookies or optional marketing sign-ups.
- **Legal obligation** – for tax, accounting, and statutory record-keeping.

If you object to marketing, we will stop immediately and place your details on a suppression list to ensure no further contact.

Who processes your data

We use trusted third-party processors to help operate our business and app. These may include:

- Base44 (app infrastructure)
- Microsoft Azure (hosting, database storage)
- OpenAI (AI processing)
- GoCardless (payment processing)
- Feathery (file uploads, forms)
- Instantly.ai (B2B email outreach)
- Google Workspace (email and storage)
- Other cloud tools for operations and analytics

Some providers process data outside the UK/EEA. Where this occurs, we use:

- Standard Contractual Clauses (SCCs)
- UK International Data Transfer Agreement (IDTA)
- Additional contractual and technical safeguards

We do not sell your personal data.

Retention

We keep personal data only as long as necessary for its purpose:

- App accounts & generated reports – retained until your account is deleted (unless required for legal retention)
- Bespoke client project files – retained for up to 7 years for legal/accounting obligations
- Marketing contacts – retained until you object or we determine they are no longer relevant
- Suppression list – retained indefinitely to honour opt-outs

You can request deletion at any time.

Your rights

Under UK GDPR, you have the right to:

- Access your data (Subject Access Request)
- Correct inaccuracies
- Request deletion
- Request restriction of processing
- Object to processing (including all marketing)
- Port your data to another service provider
- Complain to the ICO: www.ico.org.uk

To exercise your rights, email anna@repgen.ai.

We aim to respond within **one month**.

Questions?

If you have any concerns about your data or this notice, please contact:

anna@repgen.ai

RepGen

(repgen.ai)